

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

CHARLENE CARTER,  Plaintiff,  v.  SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,  Defendants.	Civil Case No. 3:17-cv-02278-X
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**DECLARATION OF BOBBY G. PRYOR  
IN SUPPORT OF PLAINTIFF CHARLENE CARTER’S  
MOTION FOR ATTORNEYS’ FEES, COSTS, AND EXPENSES**

I, Bobby G. Pryor, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm of Pryor & Bruce, and I have served as counsel to Plaintiff Charlene Carter (“Plaintiff”) since May 2022. I have personal knowledge of the matters set forth herein and am competent to give this Declaration.
2. I submit this Declaration in support of Plaintiff’s Motion for Attorneys’ Fees, Costs, and Expenses (the “Motion”).
3. Pursuant to Plaintiff’s Motion and supporting brief and the authorities cited therein, Plaintiff claims a total of \$287,162.50 in reasonable, non-redundant, and necessary fees for work by Pryor & Bruce attorneys and paralegals, which reflects total fees billed of \$292,094.00 less \$4,931.50 that the Court previously awarded for Pryor & Bruce attorneys and paralegals as sanctions. In addition, Plaintiff seeks \$7,333.78 in costs, and expenses that Carter incurred through

my firm, Pryor & Bruce, in connection with this matter as further set forth in Plaintiff's accompanying Motion and supporting brief. In support of Plaintiff's request for attorneys' fees, costs, and expenses, I hereby include **Exhibit 1**, which is a true and correct copy of the invoices cataloging the hours Pryor & Bruce attorneys and paralegals expended in connection with this matter.

4. Pryor & Bruce's invoices include contemporaneous, timekeeper-by-timekeeper entries that provide the amount of time spent on a case-by-case basis, the description of the work done during that time, the timekeeper's rate, and the total amount of fees for that day for that timekeeper. The work Pryor & Bruce performed for Plaintiff is recorded on a tenth-of-an-hour basis.

5. In preparing this fee application, for the Court's convenience, we have compiled the chart attached as **Exhibit 2**, which contains all of the time invoiced on this matter to date. Such hours are included in the column labeled "Time Sought," and a calculation of the fees for such work at Pryor & Bruce's applicable hourly rates is contained in the column labeled "Fees Sought."

6. I and the other Pryor & Bruce timekeepers exercise billing judgment in recording our time to be billed to clients, reducing hours as necessary such that the time recorded represents the value provided. In addition to exercising such judgment, our firm does not charge for travel time and did not bill time spent while the jury was deliberating during which we were waiting at the courthouse for a jury verdict or jury questions. We divide our tasks so that work is done in the most efficient manner possible by assigning tasks to an attorney with a lower billing rate or to a paralegal where possible. In doing so, we ensure that the work we are doing is not duplicative of work performed by another attorney or paralegal.

7. In formulating my opinion that Pryor & Bruce's hours are reasonable, non-redundant, and necessary, I have considered the *Johnson* factors,<sup>1</sup> including, that (a) the time and labor expended by Pryor & Bruce was reasonable and commensurate with the novelty and difficulty of the questions involved, as well as the skill requisite to perform the legal services properly; (b) the fees are reasonable in light of those customarily charged in the locality for similar legal services; (c) the fees are reasonable in light of the amount involved as a result of the controversy and the results obtained; (d) the fees are reasonable in light of the nature and length of the professional relationship between my firm and Plaintiff; and (e) the fees are reasonable in light of the experience, reputation, and ability of the lawyer performing the services on Plaintiff's behalf.

8. All time set forth in **Exhibit 2** for which compensation is claimed was reasonably and necessarily expended on this matter.

9. My hourly rate that my firm charges clients and charged in this matter at the times relevant to this fee request is \$495. I am familiar with the prevailing market rates in the Dallas community, and, from personal knowledge, my \$495 hourly rate is well below the reasonable hourly rate in the Dallas market for attorneys of my expertise and experience. I am a 1983 *summa cum laude* graduate of the University of Arkansas School of Law and was first licensed in Oklahoma in 1983. I have significant experience litigating employment cases such as this one, and am an experienced trial attorney, having tried over 100 cases.

10. Matthew Hill's hourly rate that my firm charges clients and charged in this matter at the times relevant to this fee request is \$395 per hour. Based on my knowledge of the prevailing

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<sup>1</sup> *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974).

market rates in the Dallas community, I can attest that Mr. Hill's \$395 hourly rate is well below the reasonable hourly rate in the Dallas market for attorneys of his expertise and experience. Mr. Hill is a 2001 graduate of the University of Chicago Law School, and he was first licensed in 2001. He has significant experience litigating employment cases and has been lead trial attorney in multiple trials.

11. The Pryor & Bruce paralegals who worked on this litigation and whose time is claimed hereunder are Jami Lair and Cristina Garcia. Ms. Lair has worked as a paralegal for more than seventeen years and Ms. Garcia as a legal assistant for twelve years, two years of which she has been a certified paralegal. Ms. Lair and Ms. Garcia assisted with document management, preparation for the depositions, and preparation of court filings. Ms. Lair worked 23.7 hours at an hourly rate \$160 per hour. Ms. Garcia worked 50.0 hours at an hourly rate of \$110 per hour, and 0.2 hours of that time were previously awarded as sanctions. Plaintiff seeks to recover \$9,270.00 for paralegal time. Based on my knowledge of the prevailing market rates in the Dallas community, I can attest that Ms. Lair's \$160 hourly rate and Ms. Garcia's \$110 hourly rate are well below the reasonable hourly rates in the Dallas market for paralegals of their expertise and experience.

12. In addition to the lawyers from our firm, Matthew Gilliam of the National Right to Work Legal Defense Foundation, Inc. (the "Foundation") performed work for which the Foundation seeks compensation here. Based on his particular experience and expertise regarding the matters before the Court, it is my firm belief that the \$350 hourly rate set for Mr. Gilliam in this Motion is reasonable based on those that an attorney with similar experience and background could charge in this district, based upon the customary rates in the Dallas community, which are higher than Mr. Gilliam's for attorneys with his expertise and experience. Mr. Gilliam is a skilled

attorney with significant experience in employment law matters and in dealing with the specific issues in this litigation.

13. For the nature and complexity of the case, each of the three attorneys who tried the suit for Carter were necessary for an effective presentation at trial. While the trial testimony of Audrey Stone and Edward Schneider diminished the need for other witnesses whose examinations we had prepared for, it was necessary to divide the effort of preparing for witness examinations across multiple attorneys. I handled voir dire, opening, most trial witnesses and closing. Mr. Hill was prepared to examine several witnesses that were not called and was also necessary in preparing trial arguments, the enormous task of selection and presentation of trial exhibits (without which I could not have effectively examined the trial witnesses) and managing the significant additional work that was performed during trial, including deposing Brett Nevarez. Likewise, Mr. Gilliam was indispensable at trial given his knowledge of the history of the suit, the witnesses' testimony throughout discovery, and the evidence produced in such discovery, as well as his expertise on the specific legal issues at issue in the case. In addition, Mr. Gilliam handled most of the hearings before the beginning of trial each day and the jury instruction conferences. Carter's team could not have presented her case as effectively without the participation at trial of each of these attorneys.

14. In addition, the Foundation paid Pryor & Bruce \$7,333.78 in costs and expenses expended by Pryor & Bruce on Carter's behalf in this case.

15. Attached as **Exhibit 3** is an itemized list of the fees and expenses paid by Pryor & Bruce and reimbursed by the Foundation. Because of credits for refunded witness fees that were also credited to the Foundation, the expense amounts listed on **Exhibit 3** do not match exactly with

the ones contained on the invoices. The amounts contained in **Exhibit 3** are accurate and reflect the total amounts expended and reimbursed by the Foundation that are being sought.

16. All fees charged by Pryor & Bruce that are sought here have been paid by the Foundation on Carter's behalf except for the December 1 and December 19, 2022 invoices.

17. I have reviewed the invoices of Pryor & Bruce in detail relating to these fees and costs and have determined that the time expended is reasonable, non-redundant, and necessary, given the nature of this matter, and the prevailing rates in this market.

I swear under penalty of perjury that the foregoing is true and correct.

DATED: December 19, 2022

/S/ BOBBY G. PRYOR

Bobby G. Pryor

**PRYOR & BRUCE**

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July 1, 2022

Invoice: 33-100-06

**VIA ELECTRONIC TRANSMISSION**

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
5/26	Conf. w/ M. Gilliam re case background, trial strategy, and workload distribution	MDH	1.00
5/27	Conf. w/B. Pryor and M. Hill re case background and strategy	DGB	NC (1.50)
5/27	Email M. Gilliam re confirmation of retention	MDH	.10
5/28	Select key documents for review by B. Pryor	MDH	.30
6/1	Review engagement letter; emails and confs. re the same	BGP	NC (.20)
6/1	Review and approve entry of appearance; emails re the same	BGP	.10
6/1	Email paralegal re drafting appearance of counsel; revise same; email B. Pryor and M. Gilliam re same; analysis of deadlines in scheduling order; conf. w/ M. Gilliam re documents needed and pretrial filings; review case filings in preparation for trial	MDH	4.20
6/1	Prepare notice of appearance; email M. Hill re same; file same	PL2	.20
6/2	Review docket entries and highlight entries needed for trial notebook and review; emails re the same; review scheduling order; emails re jury instructions and voir dire questions; review and outline Fourth Amended Complaint; review case law cited in Fourth Amended Complaint; teleconf w/M. Hill and M. Gilliam re status and strategy; review and outline issues relating to SW Airlines Answer	BGP	6.50

DATE	DESCRIPTION	ATTY	TIME
	to 4th Amended Complaint; emails re the same; review and outline issues re Local 566 Answer to 4th Amended Complaint; emails re the same; review deposition of M. Sims; outline issues re the same; emails re the same; review exhibits re the same; review reported cases involving M. Greenfield to determine whether any involved issues in present action; review reported cases involving P. McKeeby to determine whether any involved issues in present action		
6/2	Conf. w/ M. Gilliam re pretrial filings and strategy; email exchanges w/ B. Pryor re documents to review; identify documents for review in preparation for trial; email exchanges w/ M. Gilliam re same; email exchange w/ B. Pryor re voir dire; email B. Pryor re authorities to review	MDH	3.40
6/2	Assemble documents for B. Pryor trial preparation; research re Greenfield and McKeeby	PL	2.10
6/3	Additional review and outline of deposition of M. Sims; outline voir dire and limine topics; prepare M. Sims deposition resume; create and supplement list of involved persons; review and outline arguments, authorities and evidence re summary judgment motions and responses	BGP	7.00
6/3	Analysis of witnesses who may be designated for deposition; email B. Pryor re use of depositions for witnesses outside subpoena range; confs. w/ B. Pryor re trial and pretrial strategy	MDH	2.60
6/4	Review Amended Scheduling Order re ensuring compliance; additional review and digest of M. Sims deposition; drafting proposed voir dire questions; file review re the same; review SW and Local 556 summary judgment motions and exhibits; review and digest E. Schneider deposition; review exhibits re the same; review pleadings related to the sanction motion; review pleading relating to filing documents under seal	BGP	6.30
6/4	Review and comment on proposed email outlining pretrial tasks; review, comment, and supplement proposed voir dire questions	MDH	.50
6/5	Review written discovery; emails re the same; outline issues re Southwest and Local 556 discovery responses; review witness and exhibit list outline comments to the same; prepare witness list by location and raise Rule 45 issues; emails re the same; review document production; continue deposition review and digest of the same; continue to update voir dire questions and limine issues	BGP	7.70



DATE	DESCRIPTION	ATTY	TIME
6/5	Email B. Pryor re witness issues; email M. Gilliam re issues with motion to withdraw from J. Winford; email M. Gilliam re version of Rule 45 cited in Northern District cases	MDH	.90
6/6	Prepare for teleconf. re status and strategy; teleconf. w/M. Hill and M. Gilliam re voir dire, limine, witnesses, trial exhibit, statements of fact and law, jury instruction; teleconf w/opposing counsel re trial witnesses; review SW documents production re preparing exhibit list	BGP	7.50
6/6	Confs/ w/ M. Gilliam and B. Pryor re strategy and pretrial tasks; additional confs. w/ M. Gilliam re strategy and pretrial tasks; coordinate w/ M. Gilliam on obtaining additional documents; work on proposed jury charges and interrogatories; conf. w/ B. Pryor re settlement strategy; email exchanges w/ B. Pryor re pretrial tasks	MDH	7.80
6/7	Review, revise and finalize voir dire questions; emails re the same; emails and calls re limine issues; review Judge Scholer opinion re the same; review arbitration transcript and exhibits; review SW draft pretrial order; emails and calls re the same; teleconf. w/counsel for Union re witness and exhibit issues; review jury charge and interrogatories; review parties written discovery responses; review all deposition exhibits re preparing exhibit list; review each exhibit listed by SW and supplement exhibit list for document not included by SW; review documents re Carter damages; review exhibit list prepared by M. Gilliam and review documents re the same; supplement exhibit list re the same; review pleading re failure to exhaust administrative remedies; prepare objections to SW exhibit list; email re the same; prepare questions to M. Gilliam re various issues relating to the pretrial order; emails re the same	BGP	13.50
6/7	Continue work on jury instructions and jury interrogatories; comments on additional potential voir dire questions; confs. w/ M. Gilliam re pretrial tasks and strategy; email M. Gilliam re revised draft jury instructions; emails and confs. w/ B. Pryor re pretrial tasks and strategy; work on supplanting exhibit list and analyzing potential exhibits	MDH	11.30
6/8	Analysis and revise draft voir dire questions; review documents re preparing exhibit list; emails re the same; review deposition exhibits and testimony related to the same; emails w/M. Gilliam re status and strategy; review documents added to witness list by defendants; emails re	BGP	6.80

DATE	DESCRIPTION	ATTY	TIME
	witness issues; review M. Emlet deposition and prepare designations re the same; emails re the same		
6/8	Prepare joint and separate jury charges; email B. Pryor and M. Gilliam re same; confs. w/ B. Pryor and M. Gilliam re same; review and comment on proposed objections to disputed jury charges; conf. w/ M. Gilliam re punitive damages issue; review, comment, and supplement issues of law for pretrial filing; confs. w/ M. Gilliam re pretrial filings; review and revise issues of law for pretrial order; work on objections to Southwest's and the union's jury interrogatories; email M. Gilliam re same	MDH	12.40
6/9	Revisions to proposed pretrial order; email exchanges w/ M. Gilliam re same; prepare proposed email to P. McKeeby re pretrial order structure; email M. Gilliam re subpoenas; conference w/ M. Gilliam and opposing counsel re pretrial order; review and comment on Southwest's motion in limine; email opposing counsel re exhibit list; email paralegal re preparing subpoenas; review, comment on, and revise motion in limine; review and comment on deposition designations; additional work on jury interrogatories and instructions; email M. Gilliam re same; confs. w/ M. Gilliam re same and pretrial filings; email B. Morris re proposed exhibit 1 to pretrial order; prepare insert for pretrial filings re punitive damages; confs. w/ opposing counsel re pretrial filings; assist with finalization of pretrial filings	MDH	14.30
6/9	Prepare initial draft of deposition subpoena	PL	.20
6/10	Review and approve subpoenas; review status emails	BGP	.40
6/10	Email M. Gilliam re subpoena form; conf. w/ M. Gilliam re witness issues; conf. call w/ M. Gilliam and opposing counsel re witness issues; prepare email to opposing counsel re subpoenas; review subpoenas	MDH	3.20
6/10	Prepare subpoenas for witnesses; conf. w/ M. Hill re same; email M./ Hill re same	PL2	1.50
6/11	Work on joint status report objections; work on counter-designations and objections re Audrey Stone; review authority re conscience of the community and golden rule limine motions; email M. Gilliam re same; email M. Gilliam re comments, revisions, and additions to joint report on objections	MDH	4.10
6/12	Confs. w/ M. Gilliam re pretrial filings and limine motion; email exchange re objection to initial disclosures as exhibit; review and comment on responses to motion in limine; prepare objections to jury charge and interrogatories; revise	MDH	7.80

DATE	DESCRIPTION	ATTY	TIME
	and supplement objections and responses re Local 556's witnesses and exhibits		
6/13	Revision to objections to jury interrogatories; email exchange w/ M. Gilliam re same; review and comment re charge; email P. McKeeby re additional objection; email P. McKeeby re depositions; work to finalize Joint Status Report	MDH	2.70
6/13	Review joint status report objections; email M. Hill re same	PL2	1.00
6/14	Emails and calls re subpoena issues; review pretrial documents; confs and emails re the same	BGP	4.20
6/14	Conf. w/ B. Pryor and M. Gilliam re pretrial issues and strategy; supervise subpoena issues; email M. Gilliam re same	MDH	.80
6/14	Calculate witness fees for subpoenas; email M. Hill re same; emails re subpoenas; conf. w/ M. Hill re same; email process server subpoenas	PL2	.60
6/15	Review and revise notice re unavailability of witnesses; review rules and Judge's order the same; emails and teleconfs. w/opposing counsel re the same; email to opposing counsel re requesting witness information; review Court's order re limine issues; review pretrial documents; prepare for pretrial conf.; revise draft filing availability of witnesses; strategize re same	BGP	6.30
6/15	Review and comment re Notice of Unavailable Witnesses; additional emails and comments re same; email process server re witnesses to serve; email M. Gilliam re authority on collateral sources	MDH	1.10
6/15	Conf. w/ M. Hill re Union subpoenas; revise same; finalize same; email process server re same; review and revise notice re unavailable witnesses; conf. w/ B. Pryor re same; finalize same; file same	PL2	1.20
6/16	Prepare for pretrial conference; review documents re the same; review C. Carter deposition re preparation for client meeting; attend pretrial conference; conference w/M. Gilliam and C. Carter re status and strategy	BGP	6.40
6/16	Travel to and from courthouse	BGP	NC (1.50)
6/16	Travel to and from pretrial conference	MDH	NC (1.10)
6/16	Attend pretrial conference and viewing of voir dire room; prepare proposed email re dates of testimony	MDH	4.40
6/17	Emails and calls re exhibit issues; emails and calls re witness and deposition issues; emails re status and strategy	BGP	1.30
6/17	Review case recommended by court re business records; email B. Pryor re same; email M. Gilliam and B. Pryor re exhibit issues; call P. McKeeby and A. Greenfield re	MDH	1.70

DATE	DESCRIPTION	ATTY	TIME
	deposition dates; email B. Pryor and M. Gilliam re deposition issues; confs. w/ B. Pryor re pretrial and trial strategy issues		
6/16	Conf. w/B. Pryor re trial exhibits; assemble trial exhibits for trial	PL	2.40
6/17	Conf. w/ B. Pryor re depositions and trial exhibits; email court reporter re same	PL2	.10
6/18	Analysis of witness issues regarding trial witnesses and those to be deposed	MDH	.40
6/20	Emails and confs. re depositions issues; review SW motion for summary judgment motion and exhibits, Carter response to the same and appendix to the same; conf. w/C. Garcia re referencing appendix numbers to trial exhibit list; emails re subpoena issues; review trial exhibits; emails re status and strategy; conf. w/D. Bruce re trial analysis and strategy	BGP	7.30
6/20	Consult w/ B. Pryor re trial strategy	DGB	NC (1.50)
6/20	Conf. w/ B. Pryor re trial logistics and planning; email M. Gilliam re obtaining pretrial conference transcript; email P. McKeeby re depositions; conf. w/ M. Gilliam re witness importance; email M. Gilliam re deposition video logistics; prepare proposed email to opposing counsel re witness issues; email exchange w/ M. Gilliam and B. Pryor re same; email opposing counsel re same; email M. Gilliam re subpoena issues; conf. w/ M. Gilliam re same; email court reporter re videographer needed	MDH	3.20
6/20	Prepare trial and depo subpoena chart; email M. Hill re same	PL2	.30
6/21	Numerous emails and calls re witness issues; review file and emails re the same; review trial exhibits and depositions; general trial and deposition preparation	BGP	5.50
6/21	Email exchange w/ B. Pryor and M. Gilliam re union's extension filing; emails to court reporter re additional deposition scheduled; email B. Pryor and M. Gilliam re deadline to respond to union's motion in limine; review and comment on deposition notices; email M. Gilliam re flight attendant schedule; prepare proposed email to P. McKeeby re deposition issues; conf. w/ M. Gilliam re same; prepare proposed email to P. McKeeby re trial witness scheduling; follow-up email to M. Gilliam re deposition issues; conf. w/ P. McKeeby re deposition issues; email B. Pryor and M. Gilliam re same; email P. McKeeby re same; prepare email to E. Cloutman re witness issues	MDH	6.40

DATE	DESCRIPTION	ATTY	TIME
6/21	Review deposition and trial exhibits and update chart with correlating exhibits	PL	1.10
6/21	Begin Trial and Deposition Exhibit Correlation chart; email M. Hill re same; conf. w/ J. Lair re same; email M. Hill re deposition notices; prepare deposition notices; email M. Hill re same; prepare deposition subpoena; email M. Hill re same	PL2	2.80
6/22	Review documents and depositions in preparation for trial and deposition of Lacore; emails w/M. Gilliam re the same; additional emails and confs. re witness issues; general trial preparation; review limine rulings; review deposition notices; emails re the same; research re evidentiary objections; conf. w/D. Bruce re strategy	BGP	9.70
6/22	Consult w/ B. Pryor re trial strategy	DGB	NC (.30)
6/22	Prepare for deposition of L. Rutherford; review and comment on proposed email to union re witness issues; email paralegal re subpoena form for depositions; revise deposition notices; email opposing counsel re deposition notices; email M. Gilliam re searchable trial exhibits; conf. w/ M. Gilliam re deposition logistics; email P. McKeeby re same; email court reporter re protective order; email M. Gilliam re signed copies of same; review subpoenas and witness fee calculations; email M. Gilliam re subpoena status; review court's amended order re motions in limine; email M. Gilliam re same; email court reporter re serving Talburt	MDH	8.30
6/22	Review deposition and trial exhibits and update chart with correlating exhibits	PL	3.20
6/22	Search deposition word indexes for S. Lacore; prepare deposition notices; email M. Hill re same; finalize same; continue trial and deposition exhibit chart; prepare trial subpoenas; email M. Hill re same; finalize same; email process server re subpoenas	PL2	4.50
6/23	Trial preparation and preparation for Lacore deposition; review documents, emails and confs. re the same	BGP	7.40
6/23	Consult w/ B. Pryor re trial strategy	DGB	NC (.30)
6/23	Email M. Gilliam re Stone subpoena waiver issues; additional preparation for Rutherford deposition; email opposing counsel re exhibits for Rutherford deposition; take deposition of L. Rutherford; confs. w/ M. Gilliam re same; email court reporter re timing of transcript; email M. Gilliam re same; email exchange w/ B. Pryor re Lacore exhibits; conf. w/ B. Pryor re Lacore deposition strategy; research re conferences at deposition breaks; email B.	MDH	7.30

DATE	DESCRIPTION	ATTY	TIME
	Pryor re findings on same; review Southwest's motion to quash subpoenas		
6/23	Prepare trial subpoena for A. Stone; email M. Hill re same; revise Lacore depo prep notes; email B. Pryor re same; continue trial and deposition exhibit chart; review brief re app cites and trial exhibits	PL2	3.70
6/24	Review, organize and outline deposition exhibits re Lacore; teleconf. w/M. Gilliam re the same; Lacore deposition; confs. re trial exhibits and general status and strategy; general trial prep	BGP	6.80
6/24	Email M. Gilliam re Nevarez service status; review and comment on proposed email to P. McKeeby re Lacore availability for trial; email M. Gilliam re Stone subpoena to send for waiver of service; review Lacore trial subpoena; email M. Gilliam re same; research re court-imposed time limits; email B. Pryor and M. Gilliam re same; email B. Pryor re witness list; review depositions in preparation for trial	MDH	6.40
6/24	Draft trial subpoena for S. Lacore; email M. Hill re same; email process server re same; continue working on trial and depo exhibit chart; email B. Pryor and M. Hill re same; email M. Monk deposition exhibits; work on trial exhibit copies	PL2	3.10
6/25	General trial preparation; emails and calls w/M. Hill and M. Gilliam re status and strategy; emails w/opposing counsel re S. Lacore; emails and review of pretrial transcript re representation re S. Lacore; review and revise draft response to Local 556 motion in limine; emails and calls re the same; review response to motion to quash and emails re the same	BGP	4.20
6/25	Email B. Pryor re Southwest's position at pretrial conference on Lacore availability; email B. Pryor re trial witness identities; revise response to Local 556's motion in limine; email M. Gilliam re same; email M. Gilliam re Nevarez affidavit of service; review and comment on response to motion to quash; identify authority re court's inherent power to compel witnesses to trial; email M. Gilliam re same	MDH	3.80
6/26	Review case law re trial time limits; review witness list re the same; review file re the same; draft Objection to Time Limits or, in the Alternative, Motion to Extend Time Limits; review and revise the same; draft affidavit re the same; emails re the same	BGP	3.60



DATE	DESCRIPTION	ATTY	TIME
6/26	Email B. Pryor re witnesses to be deposed; review and revise objection to time limits; email M. Gilliam re witness statuses; review materials in preparation for depositions of Conlon and Burdine	MDH	4.10
6/27	General trial preparation including review limine issues and rulings, outline 4th amended complaint facts, review rial exhibits and prepare notes and witness examination re the same, outline trial objects to limine issues denied, emails re punitive damage issues, outline C. Carter trial preparation issues	BGP	7.70
6/27	Consult w/ B. Pryor re trial strategy	DGB	NC (.20)
6/27	Email court reporter confirming depositions of Conlon and Burdine; download trial software and review operation; email B. Pryor re response to motion in limine; email B. Pryor and M. Gilliam re service status of Hudson; email M. Gilliam re exhibit question; email M. Gilliam re comments on response to motion to quash; confs. w/ M. Gilliam re deposition questions and trial strategy; email paralegal re information for Talburt service; email M. Gilliam re Stone subpoena issues; email process server emphasizing importance of timing in Talburt service; confs. w/ B. Pryor and M. Gilliam re trial strategy and witness assignments; follow-up emails re same; prepare for depositions of Conlon and Burdine	MDH	8.70
6/27	Update subpoena chart re status of service; email M. Hill re same; call process server re same; email process server re same	PL2	.90
6/28	Emails re probable and possible trial witnesses, assigning witnesses; status of subpoenas, Hudson deposition and order of witnesses; teleconf. w/M. Gilliam and M. Hill re the same; review trial exhibits re content and determination of use at trial with witnesses; emails re the same; emails re redacted information in certain exhibits; emails re additional trial exhibits; emails re Stone subpoena and witness fees; teleconf. re motion to enlarge time; conf. w/D. Bruce re trial strategy; emails re C. Carter preparation; review documents re Carter preparation; emails re trial objections to evidence and limine issues	BGP	8.60
6/28	Consult w/ B. Pryor re trial strategy	DGB	NC (.70)
6/28	Finish preparing for Conlon deposition; email exhibits to opposing counsel and court reporter; depose B. Conlon; confs. w/ M. Gilliam re same; email paralegal re Lacore subpoena; conf. w/ M. Gilliam re Cleburn deposition; email court reporter re exhibits and timing; conf. w/ B. Pryor and	MDH	10.40

DATE	DESCRIPTION	ATTY	TIME
	M. Gilliam re witness strategy; email B. Pryor and M. Gilliam re Stone waiver of service requirements; review and comment on proposed email re Hudson deposition cancellation and trial attendance; email M. Gilliam re language for email to opposing counsel re Conlon's deposition testimony being used at trial; update response to motion to quash with service statuses; email M. Gilliam re same; email court reporter re cancellation of Hudson deposition; email M. Gilliam proposed language re confirmation on Stone attendance; prepare for deposition of N. Cleburn; review and comment on proposed email to opposing counsel on witness issues		
6/28	Assemble additional copy of trial exhibits	PL	1.40
6/28	Update subpoena chart re status of service; email M. Hill re same	PL2	.60
6/29	Digest C. Carter deposition; review exhibits re the same; general trial preparation; review supplemental exhibits and emails re the same; emails w/opposing counsel re witness issues; review order from Court re the same; review and revise status report; emails re the same; review and revise motion to enlarge time; emails re the same; review affidavit re the same	BGP	9.30
6/29	Email paralegal re additional exhibits; email M. Gilliam re deposition invoices; final preparation for Cleburn deposition; depose N. Cleburn; email court reporter re exhibits and delivery; conf. w/ M. Gilliam re deposition; conf. w/ B. Pryor re deposition highlights; review and comment on objection to time limits and affidavit re same; prepare chart for joint status report; email M. Gilliam and B. Pryor re same; email P. McKeeby re same; conf. w/ K. Frye re scheduling courtroom technology test; work on joint status report ordered by court on witness issues; email B. Pryor and M. Gilliam re same; email paralegal re same; email P. McKeeby re same; confs. and emails w/ opposing counsel re finalizing joint status report; finalize same for filing; prepare deposition designations for L. Rutherford	MDH	10.60
6/29	Work on additional trial exhibits; update subpoena chart; email M. Hill re same; prepare appendix re joint status report; email M. Hill re same; review and revise joint status report; conf. w/ M. Hill re same; assemble exhibits re appendix; finalize same; file same	PL2	4.20
6/30	Emails re deposition designations; prepare for C. Carter trial preparation; conf. w/C. Carter and M. Gilliam re the same; review and digest A. Stone deposition; review	BGP	9.60



DATE	DESCRIPTION	ATTY	TIME
	exhibits re the same; review and revise motion to enlarge and affidavit re the same; confs. re the same; emails re additional trial exhibits; confs. re the same; review court order re witnesses; confs. and emails re the same; confs. w/M. Hill and M. Gilliam re status and strategy; confs. re determining trial witnesses, order of the same and time allocations		
6/30	Review and comment on deposition designation filings; email paralegal re Rutherford designations; email M. Gilliam re same; email video sync firm re protective order acknowledgement; additional revisions to motion to extend time limits; confs. w/ M. Gilliam and B. Pryor re same; confs. w/ M. Gilliam and B. Pryor re trial strategy and witnesses; conf. w/ C. Carter re trial; prepare designations for Conlon and Cleburn depositions; email M. Gilliam re same; email opposing counsel re motion regarding time limits; email opposing counsel re protective order issues; email opposing counsel re exhibit issue; additional revisions to motion re time limits and affidavit; email opposing counsel in response to order on witnesses; email video sync company re file format for transcripts; additional conf. w/ M. Gilliam and B. Pryor re witness strategy and timing; email videographer re status of deposition videos; review errata sheets from Rutherford and Lacore; email M. Gilliam re same; review and comment on motion for leave to submit exhibits; email exchange w/ M. Gilliam re same; review and comment on deposition designations for Conlon and Cleburn; email M. Gilliam re same	MDH	9.40
6/30	Prepare supplemental deposition designations; review designations for Cleburn and Conlon	PL	.60
6/30	Review designations to add L. Rutherford depo designations; email M. Hill re same; add B. Conlon designations; email J. Lair re same; update subpoena chart; email M. Hill re same	PL2	1.00

**ATTORNEY/PARALEGAL HOURS/FEEES**

<b>ATTY</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
BGP	153.70	\$495.00	\$76,081.50
DGB	4.50 NC	\$495.00	\$0 (\$2,227.50 NC)
MDH	163.60	\$395.00	\$64,622.00
Paralegal	11.00	\$160.00	\$1,760.00
Paralegal 2	25.70	\$110.00	\$2,827.00
<b><i>Total Attorney/Paralegal Fees:</i></b>			<b>\$145,290.50</b>

**EXPENSES:**

<b>Description</b>	<b>Qty.</b>	<b>Amt.</b>	<b>Total</b>
Copies	14,890	.15	\$2,233.50
Pacer			\$19.60
Parking			\$30.00
Professional Civil Process Witness Fees			\$3,782.60
Express Litigation Services (c/o Paulo McKeeby: Barnett, Cleburn, Conlon, Emlet, Gutierrez, Hudson, Jones, Lacore, Nevarez, Parker, Parrott, Schneider, Shaffer, Talbert, Sims)			\$1,452.25
Express Litigation Services (Gutierrez)			\$166.24
Express Litigation Services (Hudson)			\$395.37
Express Litigation Services (c/o Edward Cloutman: Nevarez and Parker)			\$185.08
Express Litigation Services (c/o Adam Greenfield: Nevarez and Parker)			\$237.12
Express Litigation Services (Shaffer)			\$194.44
Professional Civil Process (Parker and Nevarez)			\$364.00
Mileage	60	.29	\$17.40
<b>Total Expenses:</b>			<b>\$9,077.60</b>
<b>Copy Expense Discount:</b>			<b>(\$744.50)</b>
<b>TOTAL EXPENSES DUE:</b>			<b>\$8,333.10</b>

**DUE THIS INVOICE:            \$153,623.60**

**PRYOR & BRUCE**

Attorneys at Law

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Rockwall, Texas 75087

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August 2, 2022

Invoice: 002

**VIA ELECTRONIC TRANSMISSION**

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
7/1	Review pleading re after-acquired evidence defense; emails re the same; prepare for C. Carter trial preparation session; conf. w/M. Gilliam and C. Carter re the same; review Burdine related documents; emails and confs. re press inquiries; review court second amended order on motions in limine; confs. and emails re the same; consider and outline evidence re the same; emails re communication w/Court re efforts to obtain Talburt deposition; review email from opposing counsel re Parker, Nevarez and Talburt subpoena issues; emails re the same; review draft status report re the same; emails w/opposing counsel re depositions; review latest court order re witness subpoenas and depositions; emails and confs. re the same; review Court order re late added exhibits; review deposition designations; review exhibits and prepare for examination of witnesses at trial	BGP	9.00
7/1	Review pleadings re after-acquired evidence; email M. Gilliam and B. Pryor re same; email process server re service of Talburt; meet w/ K. Frye at courthouse to test video setup for trial; email exchange w/ R. Jones re synching deposition videos; review and comment on proposed email to opposing counsel re Parker, Talburt, and Nevarez depositions; review and revise status report on	MDH	8.60

DATE	DESCRIPTION	ATTY	TIME
	witnesses; review and approve deposition subpoenas of Talburt and Nevarez; set up synched transcripts in presentation software; set up exhibits re same; prepare draft email to P. McKeeby re witness status; prepare email to process server re Talburt; revise deposition notices to Talburt and Nevarez; prepare additional draft email to P. McKeeby re deposition issues; email process server re Nevarez; email court reporter/videographer re noticed depositions; conf. w/ process server re Nevarez; prepare draft designations for Burdine		
7/1	Travel to and from courthouse	MDH	NC (1.00)
7/1	Email process server re status; call process server re same; conf. w/ M. Gilliam re same; update subpoena chart; prepare draft deposition subpoenas for Talburt and Nevarez; email M. Hill re same; prepare deposition notices for Talburt and Nevarez; email M. Hill re same; call process servers re pricing and availability; conf. w/ M. Hill re same; email process server re Brian Talburt; email M. Hill re process server for Brett Nevarez; prepare juror chart; email to M. Hill re same; revise deposition notices for Talburt and Nevarez; review pleadings on docket	PL2	2.70
7/2	Prepare witness notebooks for S. Lacore, B. Talburt and N. Hudson; review C. Carter deposition; emails re witness depositions; emails and confs. re B. Talburt deposition; review documents re Talburt deposition; Talburt deposition preparation; review exhibits and prepare for examination of witnesses at trial; emails re time limits on Talburt deposition	BGP	8.40
7/2	Prepare for examination of B. Nevarez; emails to P. McKeeby re depositions of Talburt and Nevarez; prepare presentation software for presentation of exhibits and videos; review and comment on juror diagram; revise juror chart; select portions of Conlon deposition to designate; email Burdine questioning clip to B. Pryor for use with Schneider; review documents sent by C. Carter; conf. w/ P. McKeeby re Talburt deposition; follow-up email re same; conferences w/ M. Gilliam and B. Pryor re trial preparation; email court reporters re deposition scheduling; work on witness order and strategy; prepare new subpoena for B. Talburt; confs. w/ process server re serving Talburt; prepare draft email to E. Cloutman re deposition of Talburt; follow-up email to court reporters with update; email exchange w/ P. McKeeby re deposition scheduling	MDH	9.40

DATE	DESCRIPTION	ATTY	TIME
7/2	Update B. Pryor's exhibit notebooks with added exhibits; update exhibit folders and C. Carter's exhibit binders with added exhibits; trial preparation	PL2	5.10
7/3	Finalize preparation for Talburt deposition; prepare for Stone trial examination; review trial exhibits and highlight questions and related witnesses; review M. Gilliam notes re Talburt deposition; Talburt deposition' trial preparation	BGP	12.20
7/3	Email P. McKeeby re Talburt deposition scheduling; email court reporters updating re same; continue preparing for deposition of B. Nevarez; identify exhibits for same; analysis of potential additional exhibits; email P. McKeeby re deposition; prepare exhibits for trial; confs. w/ B. Pryor and M. Gilliam re trial strategy; email opposing counsel re Talburt exhibits	MDH	9.20
7/3	Trial preparation including updating update trial exhibits; review pretrial transcript and prepare notes re procedures to follow during trial	PL	5.00
7/4	Prepare opening and voir dire; continue review of trial exhibits and highlight questions and related witnesses; conf. w/M. Hill, M. Gilliam, and C. Carter re opening	BGP	11.80
7/4	Additional preparation for Nevarez deposition; finalize jury charts; email M. Gilliam re same; attend non-appearance by B. Nevarez at deposition; comment on proposed opening from B. Pryor; strategy re witness order and trial presentation; prepare for examination of J. Parrott; prepare for examination of M. Sims; email M. Gilliam re potential justifications for sanctions on defendants re depositions; prepare for trial	MDH	10.80
7/4	Trial preparation including updating update trial exhibits; review pretrial transcript and prepare notes re procedures to follow during trial	PL	4.50
7/5	Additional preparation for opening and voir dire; prepare final anticipated witness list, order of witnesses and time allotments; review emails and court rulings re voir dire questions; conf, at trial w/court re voir dire issues and general trial matters; voir dire; hearing before court on strikes for cause; confs. re exercising peremptory challenges; hearing before court on trial matters; conf w/M. Hill and M. Gilliam re status and strategy	BGP	9.30
7/5	Travel to and from Court	BGP	NC (1.00)
7/5	Teleconf. w/B. Pryor re strategy re jury selection and opening	DGB	NC (.60)
7/5	Review and comment re motion for compliance with court order; conf. w/ M. Gilliam re same; email exchange w/ M.	MDH	10.60

DATE	DESCRIPTION	ATTY	TIME
	Gilliam re daily transcripts; review and comment on proposed order on failure to appear; email OnCue re issues displaying exhibits; email B. Pryor re objections to make at trial; notes re preparation for voir dire; attend voir dire; prepare proposed exhibit email for court; prepare unredacted exhibits; prepare designations for J. Parker; preparations for potential witness examinations		
7/5	Travel to and from Court	MDH	NC (.80)
7/5	Email M. Hill indexes of trial boxes	PL2	.10
7/6	Prepare for opening and Stone examination; conf. w/court re trial matters; trial including opening and Stone examination; post trial confs w/court; conf w/M. Hill and M. Gilliam re status and strategy	BGP	10.60
7/6	Travel to and from Court	BGP	NC (1.00)
7/6	Teleconf. w/OPC's paralegal re exhibit list; email w/M. Hill re same; conf. w/C. Garcia re same; teleconf. w/B. Pryor re strategy re witness examination	DGB	NC (.50)
7/6	Attend trial; email S. Rhea re exhibit list; email OnCue re support for presentation software; email M. Gilliam re designation objections; prepare responses to objections re Parrott and Rutherford designations	MDH	11.40
7/6	Travel to and from Court	MDH	NC (.80)
7/6	Call w/ S. Rhea re exhibit list; revise joint exhibit list; email M. Hill re same; file amended exhibit list; email M. Hill re same; review video duration times; email M. Hill re same; update subpoena chart	PL2	.60
7/7	Prepare for additional Stone examination and prepare for Schneider examination; prepare argument for additional jury time; conf w/court re trial matters including request for additional jury time; trial including examination of Stone and Schneider; post trial confs. w/court; conf w/M. Hill and M. Gilliam re status and strategy; preparation for additional Schneider examination and Carter examination	BGP	13.40
7/7	Travel to and from Court	BGP	NC (1.00)
7/7	Teleconf. w/B. Pryor re upcoming Carter examination	DGB	NC (.60)
7/7	Revisions to responses to objections to Parrott and Rutherford designations; email S. Silver re Exhibit 21; attend trial; email paralegals re redactions; revise Talburt designations to cut time; edit video re same; email paralegals re serving Nevarez; email opposing counsel re service of Nevarez; conf. w/ process server re same; email process server re revisions to declaration; prepare proposed declaration re same; email K. Willis re Talburt designations; email M. Gilliam re status of same	MDH	11.30

DATE	DESCRIPTION	ATTY	TIME
7/7	Travel to and from Court	MDH	NC (.80)
7/7	Redactions to trial exhibits and marking as trial exhibits	PL	.80
7/7	Prepare revised draft deposition subpoena for Brett Nevarez; call New Mexico process server; email M. Hill re same; call Dona Ana Process Servers re service on Brett Nevarez; email M. Hill re same; email Dona Ana process server and M. Hill re Brett Nevarez service; review exhibit list to check if Exhibit 21-a was added twice; email M. Hill re same	PL2	1.50
7/8	Trial preparation; conf. w/court re trial matters; trial including examination of Schneider and Carter; conf. w/court re post trial matters; conf w/M. Hill and M. Gilliam re status and strategy	BGP	9.80
7/8	Travel to and from Court	BGP	NC (1.00)
7/8	Email exchange w/ M. Gilliam re process server declaration; prepare Zoom link for Nevarez deposition; email court reporters and opposing counsel re same; attend trial; prepare for Nevarez deposition; take Nevarez deposition; confs. w/ B. Pryor and M. Gilliam re same; email videographer re same; email B. Pryor and M. Gilliam re excusing Parrott and Shaffer; email M. Gilliam re notifying court on Nevarez deposition; email court re same	MDH	11.60
7/8	Travel to and from Court	MDH	NC (.80)
7/9	Status email re invoking the rule issues, objecting to cyber bullying exhibit, future use of time, February 2017 RFB exhibit, Nevarez deposition, C. Carter testimony, potential Sim testimony, and directed verdict issues; emails re the same; review documents and emails re designation of workplace bullying policy; review court draft jury questions; review Local 556 brief re directed verdict issues; review SW brief re directed verdict issues; review C. Carter brief re directed verdict; review Nevarez designations	BGP	4.50
7/9	Email answers to trial strategy questions from B. Pryor; review and comment on draft trial brief; conf. w/ M. Gilliam re same; email potential authority for use in same to M. Gilliam; email R. Jones re synching Nevarez transcript; review and revise trial brief; email M. Gilliam re same; prepare designations for B. Nevarez; prepare video re same	MDH	5.60
7/10	Review notes re C. Carter direct examination and prepare for conclusion of the same; review documents re C. Carter damages; prepare examination re the same; prepare for opposition to late added exhibit re cyber bullying; review documents re the same; emails re damage issues; review	BGP	5.60



DATE	DESCRIPTION	ATTY	TIME
	directed verdict notes; organize Carter deposition re doctrine of optional completion on anticipated cross examination topics		
7/10	Teleconf. w/B. Pryor re trial strategy and case theories	DGB	NC (.30)
7/10	Email M. Gilliam re Nevarez designations; email B. Pryor re C. Carter direct strategy; review and comment on jury charge trial brief; identify exhibits to object to; review and comment on draft objections; email S. Silver re Exhibit 147	MDH	4.20
7/11	Additional preparation for C. Carter cross examination; prepare for informal charge conference; review draft instructions and questions re the same; informal charge conference; pretrial matters; trial including conclusion of C. Carter examination, resting C. Carter case, SW witnesses and post-trial issues; prepare for cross examination of Schneider and initial preparation for closing	BGP	12.60
7/11	Travel to and from Court	BGP	NC (1.00)
7/11	Identify objections to deposition counter-designations by Southwest; prepare draft objections; email M. Gilliam re same; attend trial; email opposing counsel re redacted exhibits; email B. Pryor re Schneider transcripts; review and comment on potential objections; email K. Frye re redacted exhibits; email B. Pryor and M. Gilliam re accommodation language; prepare exhibit re net worth; email B. Pryor re strategy re same	MDH	11.20
7/11	Travel to and from Court	MDH	NC (.80)
7/11	Additional redactions for Court; email exchange w/ M. Hill; determine exhibit correlation; revise exhibits; email M. Hill re same	PL2	1.60
7/12	Emails and confs re damage issues; review daily trial transcripts re witness examination and closing preparation; review court draft jury charge; trial including cross examination of SW witnesses and C. Carter; review trial exhibits re preparation for demonstrative evidence during closing; conf w/M. Gilliam and M. Hill; charge conference; prepare for closing argument; teleconfs re the same	BGP	14.60
7/12	Travel to and from Court	BGP	NC (1.00)
7/12	Attend trial; analysis of court's jury charge; conf. w/ B. Pryor re closing; prepare materials re same; email B. Pryor re strategy for union punitive damage argument; work on preparing exhibits and testimony for closing; email B. Pryor re outline re same	MDH	16.80
7/12	Travel to and from Court	MDH	NC (.80)
7/12	Assemble admitted trial exhibits for jury; update index re same	PL	2.10

DATE	DESCRIPTION	ATTY	TIME
7/12	Assemble admitted exhibits notebooks	PL2	1.20
7/13	Prepare for closing; emails and confs. re the same; pretrial conf. issues; trial including closing	BGP	10.30
7/13	Travel to and from Court	BGP	NC (1.00)
7/13	Work on identifying additional testimony for closing; prepare highlights re same; prepare exhibits re same; attend trial; strategy re jury question	MDH	6.10
7/13	Travel to and from court; wait for jury verdict	MDH	NC (3.80)
7/13	Update admitted trial exhibits index with additional admitted exhibits; email re same	PL	.30
7/13	Revise admitted trial exhibits index; email M. Hill re same; conf. w/ M. Hill re admitted trial exhibits index; revise same; email M. Hill re same; call w/ courier re box of admitted trial exhibits to court	PL2	.80
7/14	Travel to courthouse; await jury verdict; hearing re jury verdict; conf. w/client	BGP	NC (4.80)
7/14	Strategy re jury questions; analysis of verdict; wrap up trial and remove documents from courtroom	MDH	1.60
7/14	Wait for jury verdict; travel to and from Court	MDH	NC (7.30)
7/15	Emails re press inquiries; emails re status and strategy; review press reporting re Southwest and Union statements; emails and teleconf w/M. Gilliam re contact w/jurors	BGP	.40
7/15	Email M. Gilliam and B. Pryor re media strategy; email M. Gilliam re Rule 50 timing	MDH	.20
7/16	Analysis re post-verdict motions; email findings to M. Gilliam	MDH	1.70
7/18	Review press reports; calls and confs re the same; interview juror; confs w/M. Gilliam re status and strategy	BGP	NC (3.30)
7/18	Search and email M. Hill re sample of motion for fees	PL2	.60
7/19	Prepare prejudgment interest calculation; locate cases re calculation of same; email M. Gilliam re same	MDH	.60
7/20	Email M. Gilliam re confidentiality of trial transcripts	MDH	.10
7/24	Begin review of motion for judgment; email M. Gilliam re same	MDH	1.10
7/25	Review cases re damage caps on union; email exchange w/ M. Gilliam re same; review and comment on motion for judgment; review and comment on affidavit in support of same; revise prejudgment interest calculation spreadsheet; emails to B. Pryor and M. Gilliam re same	MDH	2.30
7/26	Review revised motion for judgment; confs. w/ M. Gilliam re same; emails w/ M. Gilliam re same;	MDH	1.30
7/27	Review court's order to determine deadline for potential reply re sanctions; email M. Gilliam re same	MDH	.10

**ATTORNEY/PARALEGAL HOURS/FEEES**

ATTY	Hours	Rate	Total
BGP	132.50 (15.10 NC)	\$495.00	\$65,587.50 (\$7,474.50 NC)
DGB	2.00 NC	\$495.00	\$0 (\$990.00 NC)
MDH	135.80 (16.90 NC)	\$395.00	\$53,641.00 (\$6,675.50 NC)
Paralegal	12.70	\$160.00	\$2,032.00
Paralegal 2	14.20	\$110.00	\$1,562.00
<b>Total Attorney/Paralegal Fees:</b>			<b>\$122,822.50</b>

**EXPENSES:**

Description	Qty.	Amt.	Total
Copies	1,647	.15	\$247.05
Pacer			\$1.70
Parking			\$312.70
OnCue Technology Support			\$86.40
Express Litigation Services (Burdine)			\$105.00
Express Litigation Services (Barnett)			\$164.94
Express Litigation Services (Lacore)			\$211.36
Express Litigation Services (Parrott)			\$152.20
Dona Ana Servers (Nevarez)			\$146.22
North Texas Legal Video (Lacore, Conlon, Cleburn, Nevarez 07/08/22)			\$1,609.00
Valleywide Process Service (Talbert)			\$1,240.00
MetroOne Courier			\$104.83
Staples			\$22.03
Mileage	317	.29	\$91.93
<b>Total Expenses:</b>			<b>\$4,495.36</b>
<b>Express Litigation Services Credit:</b>			<b>(\$90.83)</b>
<b>Professional Civil Process Credit:</b>			<b>(\$1,741.16)</b>
<b>TOTAL EXPENSES DUE:</b>			<b>\$2,663.37</b>

<b>PAST DUE (JULY 1, 2022):</b>	<b>\$153,623.60</b>
<b>DUE THIS INVOICE:</b>	<b>\$125,485.87</b>
<b>TOTAL DUE:</b>	<b>\$279,109.47</b>

**PRYOR & BRUCE**

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September 3, 2022

Invoice: 003

**VIA ELECTRONIC TRANSMISSION**

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
8/2	Conf. w/ M. Gilliam re judgment issues; email M. Gilliam re article and case re same; locate and email M. Gilliam unredacted documents	MDH	.60
8/3	Conf. w/ M. Gilliam re invoices; email M. Gilliam re same	MDH	NC (.30)
8/3	Conf. w/ M. Gilliam re RLA punitive damages issue	MDH	.60
8/5	Review Local 556 correspondence to SWA re Lacore; emails and calls re the same	BGP	NC (.40)
8/8	Review and comment on reply in support of motion for sanctions; email M. Gilliam re same	MDH	.80
8/9	Review Hill declaration re sanction; review reply re non-compliance; emails re the same	BGP	NC (.40)
8/9	Conf. w/ M. Gilliam re reply in support of motion for sanctions; additional comments on same; review and comment on Hill Declaration re same; review Southwest's response to motion for entry of judgment; review union's response re same	MDH	.80
8/10	Review SW response to Motion for Entry of Judgment; review B. Morris affidavit; emails re the same; emails re press inquiries	BGP	NC (.40)
8/11	Conf. w/ M. Gilliam re issues in reply in support of motion for judgment	MDH	.30
8/12	Email re comments to SW motion re entry of judgment	BGP	NC (.20)

DATE	DESCRIPTION	ATTY	TIME
8/15	Review reply to SW response to motion for entry of judgment; email comments to M. Hill re the same	BGP	NC (.40)
8/15	Review draft reply in support of motion for judgment re Southwest; email M. Gilliam re same	MDH	.30
8/16	Review and comment on Local 556 response to motion for judgment; emails re the same	BGP	NC (.50)
8/16	Comment on draft reply in support of motion for judgment re Southwest; comment on same re union; additions to draft reply in support of judgment to address Scudero case; conferences w/ M. Gilliam re briefs	MDH	4.80
8/31	Email M. Gilliam re attorney fee affidavit sample	MDH	.20

**ATTORNEY/PARALEGAL HOURS/FEEES**

ATTY	Hours	Rate	Total
BGP	(2.30 NC)	\$495.00	(\$1,138.50 NC)
DGB	NA	\$495.00	\$0
MDH	8.40 (.30 NC)	\$395.00	\$3,318.00 (\$118.50 NC)
Paralegal	NA	\$160.00	\$0
Paralegal 2	NA	\$110.00	\$0
<b>Total Attorney/Paralegal Fees:</b>			<b>\$3,318.00</b>

**EXPENSES:**

NA

**TOTAL DUE:****\$3,318.00**

**PRYOR & BRUCE**

Attorneys at Law

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December 3, 2022

Invoice: 004

**VIA ELECTRONIC TRANSMISSION**

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
11/11	Review court order re calculation of prejudgment interests; emails re the same	BGP	.20
11/11	Review order re prejudgment interest; email M. Gilliam re interest calculation logistics; conf. w/ M. Gilliam re same; prepare spreadsheet re same	MDH	.90
11/13	Initial review of brief and chart re prejudgment interest	MDH	.20
11/14	Review supplemental brief re calculation of prejudgment interest; emails re the same	BGP	.20
11/14	Review and comment on prejudgment interest brief and calculation; email M. Gilliam re same; conf. w/ M. Gilliam re same; final review and comments on brief	MDH	2.30
11/16	Review Union brief re pre-judgment interest; emails re the same; review Court's order re award of sanctions; prepare emails to M. Hill re matters for inclusion	BGP	.70
11/16	Email M. Gilliam re advisability of motion to strike late-filed brief; review Court's order re award of sanctions	MDH	.30
11/17	Review and comment on draft submission on Nevarez; emails to M. Hill re same	BGP	.30
11/17	Review and revise draft submission on Nevarez fees from M. Gilliam; review invoices to identify time to include; research to locate additional cases for inclusion in submission; review and comment on proposed addition from B. Pryor; confs. w/ M. Gilliam re submission	MDH	5.10

DATE	DESCRIPTION	ATTY	TIME
11/18	Email M. Hill re additional thoughts on Nevarez fee submission; review and approve declaration of B. Pryor re fees and expenses; additional review and comment re fee submission; confs. w/ M. Hill re same	BGP	.60
11/18	Further revisions to submission re Nevarez; confs. w/ M. Gilliam re same	MDH	4.60
11/18	Review August invoice for expenses related to Nevarez; email M. Hill re same; conf. w/ M. Hill re same; review expense chart re additional Nevarez charges; email M. Hill re same	PL2	.30
11/21	Email B. Pryor re bill of costs filing correction by court	MDH	.10
11/22	Review Southwest and Union objections to bill of costs; emails re the same	BGP	.30
11/22	Review Southwest's objection re sanctions; email M. Gilliam key argument points re same	MDH	.30
11/25	Review reply brief re bill of costs	BGP	.10
11/25	Review, revise, and comment on reply brief re sanctions; email M. Gilliam re same; confs. w/ M. Gilliam re same; email M. Gilliam re local rule issue; final review and comments on reply brief	MDH	2.70

**ATTORNEY/PARALEGAL HOURS/FEEES**

ATTY	Hours	Rate	Total
BGP	2.40	\$495.00	\$1,188.00
DGB	NA	\$495.00	\$0
MDH	16.50	\$395.00	\$6,517.50
Paralegal	NA	\$160.00	\$0
Paralegal 2	.30	\$110.00	\$33.00
<b><i>Total Attorney/Paralegal Fees:</i></b>			<b>\$7,738.50</b>

**EXPENSES:**

NA

**TOTAL DUE:****\$7,738.50**



**PRYOR & BRUCE**

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December 19, 2022

Invoice: 005

**VIA ELECTRONIC TRANSMISSION**

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
12/5	Review order re sanctions; emails re the same; review order and opinion re judgment; emails re the same	BGP	.10
12/5	Review and analysis of court's order on sanctions, opinion on judgment, and judgment	MDH	.70
12/12	Emails and teleconfs. re issues relating to sanctions order and issues re SW potential appeal and bond	BGP	.30
12/12	Conference w/ paralegal re expenses for inclusion in bill of costs; email M. Gilliam re same; email M. Gilliam information for attorney fee motion	MDH	.40
12/14	Emails and teleconfs. re fee application issues and bond issues	BGP	.30
12/14	Email M. Gilliam comments re supersedeas bond response to P. McKeeby; review rules and cases re same; email M. Gilliam re same	MDH	.80
12/15	Review and revision of attorney fee motion	MDH	3.70
12/15	Review expense chart; review invoices and payments of same	PL2	2.30
12/16	Review invoice and allocate time; email to M. Gilliam and M. Hill re issues relating to the same	BGP	1.20
12/16	Additional revision of attorney fee motion; confs. w/ B. Pryor and M. Gilliam re same; email revised motion to M. Gilliam; email M. Gilliam re authority for inclusion in fee petition; email and conf. w/ paralegal re updating bill of	MDH	5.20

DATE	DESCRIPTION	ATTY	TIME
	costs; review and comment on motion and order re attorney fees		
12/16	Continue reviewing expense chart; continue reviewing invoices and payments of same; email M. Hill re same; conf. w/ M. Hill re bill of costs; review bill of costs and expense chart	PL2	2.40
12/17	Analysis of invoices for inclusion in attorney fee petition; confs. w/ M. Gilliam re same and arguments in attorney fee petition; emails w/ M. Gilliam re issues for attorney fee petition	MDH	3.50
12/18	Review and comment on proposed declarations of M. Gilliam, J. Winford, and B. Pryor re attorney fees; emails and confs. w/ M. Gilliam re strategic issues in attorney fee petition; email B. Pryor re same	MDH	3.20
12/18	Continue to review and revise bill of costs	PL2	1.60
12/19	Continue to review and revise bill of costs; email M. Hill re same	PL2	3.50
12/19	Confs. w/ M. Gilliam, B. Pryor, and C. Garcia re motion for attorneys' fees and bill of costs; revisions to same; research re items included in bill of costs and expenses	MDH	6.10
12/19	Review and revise motions re fees and costs; emails and confs. re the same; review exhibits to the same; review declaration and exhibits re the same	BGP	3.20

**ATTORNEY/PARALEGAL HOURS/FEEES**

ATTY	Hours	Rate	Total
BGP	5.10	\$495.00	\$2,524.50
DGB	NA	\$495.00	\$0
MDH	23.60	\$395.00	\$9,322.00
Paralegal	NA	\$160.00	\$0
Paralegal 2	9.8	\$110.00	\$1,078.00
<b>Total Attorney/Paralegal Fees:</b>			<b>\$12,924.50</b>

**EXPENSES:**

Description	Qty.	Amt.	Total
Copies	11	.15	\$1.65
<b>Total Expenses:</b>			<b>\$1.65</b>

**PAST DUE (DEC. 2022):       \$ 7,738.50**

**DUE THIS INVOICE:           \$ 8,932.65**

**TOTAL DUE:                   \$16,671.15**

**Exhibit 2 - Pryor & Bruce Fees Charged**

<b>Date</b>	<b>Description</b>	<b>Timekeeper</b>	<b>Time Billed</b>	<b>Time Sought</b>	<b>Fees Sought</b>
5/26/2022	Conf. w/ M. Gilliam re case background, trial strategy, and workload distribution	MDH	1.0	1.0	\$ 395.00
5/27/2022	Confs. w/B. Pryor and M. Hill re case background and strategy	DGB	NC (1.50)	0.0	\$ -
5/27/2022	Email M. Gilliam re confirmation of retention	MDH	0.1	0.1	\$ 39.50
5/28/2022	Select key documents for review by B. Pryor	MDH	0.3	0.3	\$ 118.50
6/1/2022	Review engagement letter; emails and confs. re the same	BGP	NC (.20)	0.0	\$ -
6/1/2022	Review and approve entry of appearance; emails re the same	BGP	0.1	0.1	\$ 49.50
6/1/2022	Email paralegal re drafting appearance of counsel; revise same; email B. Pryor and M. Gilliam re same; analysis of deadlines in scheduling order; conf. w/ M. Gilliam re documents needed and pretrial filings; review case filings in preparation for trial	MDH	4.2	4.2	\$ 1,659.00
6/1/2022	Prepare notice of appearance; email M. Hill re same; file same	PL2	0.2	0.2	\$ 22.00

6/2/2022	Review docket entries and highlight entries needed for trial notebook and review; emails re the same; review scheduling order; emails re jury instructions and voir dire questions; review and outline Fourth Amended Complaint; review case law cited in Fourth Amended Complaint; teleconf w/M. Hill and M. Gilliam re status and strategy; review and outline issues relating to SW Airlines Answer to 4th Amended Complaint; emails re the same; review and outline issues re Local 566 Answer to 4th Amended Complaint; emails re the same; review deposition of M. Sims; outline issues re the same; emails re the same; review exhibits re the same; review reported cases involving M. Greenfield to determine whether any involved issues in present action; review reported cases involving P. McKeeby to determine whether any involved issues in present action	BGP	6.5	6.5	\$ 3,217.50
6/2/2022	Confs. w/ M. Gilliam re pretrial filings and strategy; email exchanges w/ B. Pryor re documents to review; identify documents for review in preparation for trial; email exchanges w/ M. Gilliam re same; email exchange w/ B. Pryor re voir dire; email B. Pryor re authorities to review	MDH	3.4	3.4	\$ 1,343.00

6/2/2022	Assemble documents for B. Pryor trial preparation; research re Greenfield and McKeeby	PL	2.1	2.1	\$ 336.00
6/3/2022	Additional review and outline of deposition of M. Sims; outline voir dire and limine topics; prepare M. Sims deposition resume; create and supplement list of involved persons; review and outline arguments, authorities and evidence re summary judgment motions and responses	BGP	7.0	7.0	\$ 3,465.00
6/3/2022	Analysis of witnesses who may be designated for deposition; email B. Pryor re use of depositions for witnesses outside subpoena range; confs. w/ B. Pryor re trial and pretrial strategy	MDH	2.6	2.6	\$ 1,027.00
6/4/2022	Review Amended Scheduling Order re ensuring compliance; additional review and digest of M. Sims deposition; drafting proposed voir dire questions; file review re the same; review SW and Local 556 summary judgment motions and exhibits; review and digest E. Schneider deposition; review exhibits re the same; review pleadings related to the sanction motion; review pleading relating to filing documents under seal	BGP	6.3	6.3	\$ 3,118.50
6/4/2022	Review and comment on proposed email outlining pretrial tasks; review, comment, and supplement proposed voir dire questions	MDH	0.5	0.5	\$ 197.50

6/5/2022	Review written discovery; emails re the same; outline issues re Southwest and Local 556 discovery responses; review witness and exhibit list outline comments to the same; prepare witness list by location and raise Rule 45 issues; emails re the same; review document production; continue deposition review and digest of the same; continue to update voir dire questions and limine issues	BGP	7.7	7.7	\$ 3,811.50
6/5/2022	Email B. Pryor re witness issues; email M. Gilliam re issues with motion to withdraw from J. Winford; email M. Gilliam re version of Rule 45 cited in Northern District cases	MDH	0.9	0.9	\$ 355.50
6/6/2022	Prepare for teleconf. re status and strategy; teleconf. w/M. Hill and M. Gilliam re voir dire, limine, witnesses, trial exhibit, statements of fact and law, jury instruction; teleconf w/opposing counsel re trial witnesses; review SW documents production re preparing exhibit list	BGP	7.5	7.5	\$ 3,712.50

6/6/2022	Confs/ w/ M. Gilliam and B. Pryor re strategy and pretrial tasks; additional confs. w/ M. Gilliam re strategy and pretrial tasks; coordinate w/ M. Gilliam on obtaining additional documents; work on proposed jury charges and interrogatories; conf. w/ B. Pryor re settlement strategy; email exchanges w/ B. Pryor re pretrial tasks	MDH	7.8	7.8	\$ 3,081.00
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6/7/2022	Review, revise and finalize voir dire questions; emails re the same; emails and calls re limine issues; review Judge Scholer opinion re the same; review arbitration transcript and exhibits; review SW draft pretrial order; emails and calls re the same; teleconf. w/counsel for Union re witness and exhibit issues; review jury charge and interrogatories; review parties written discovery responses; review all deposition exhibits re preparing exhibit list; review each exhibit listed by SW and supplement exhibit list for document not included by SW; review documents re Carter damages; review exhibit list prepared by M. Gilliam and review documents re the same; supplement exhibit list re the same; review pleading re failure to exhaust administrative remedies; prepare objections to SW exhibit list; email re the same; prepare questions to M. Gillam re various issues relating to the pretrial order; emails re the same	BGP	13.5	13.5	\$ 6,682.50
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6/7/2022	Continue work on jury instructions and jury interrogatories; comments on additional potential voir dire questions; confs. w/ M. Gilliam re pretrial tasks and strategy; email M. Gilliam re revised draft jury instructions; emails and confs. w/ B. Pryor re pretrial tasks and strategy; work on supplanting exhibit list and analyzing potential exhibits	MDH	11.3	11.3	\$ 4,463.50
6/8/2022	Analysis and revise draft voir dire questions; review documents re preparing exhibit list; emails re the same; review deposition exhibits and testimony related to the same; emails w/M. Gilliam re status and strategy; review documents added to witness list by defendants; emails re witness issues; review M. Emlet deposition and prepare designations re the same; emails re the same	BGP	6.8	6.8	\$ 3,366.00

6/8/2022	Prepare joint and separate jury charges; email B. Pryor and M. Gilliam re same; confs. w/ B. Pryor and M. Gilliam re same; review and comment on proposed objections to disputed jury charges; conf. w/ M. Gilliam re punitive damages issue; review, comment, and supplement issues of law for pretrial filing; confs. w/ M. Gilliam re pretrial filings; review and revise issues of law for pretrial order; work on objections to Southwest's and the union's jury interrogatories; email M. Gilliam re same	MDH	12.4	12.4	\$ 4,898.00
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6/9/2022	Revisions to proposed pretrial order; email exchanges w/ M. Gilliam re same; prepare proposed email to P. McKeeby re pretrial order structure; email M. Gilliam re subpoenas; conference w/ M. Gilliam and opposing counsel re pretrial order; review and comment on Southwest's motion in limine; email opposing counsel re exhibit list; email paralegal re preparing subpoenas; review, comment on, and revise motion in limine; review and comment on deposition designations; additional work on jury interrogatories and instructions; email M. Gilliam re same; confs. w/ M. Gilliam re same and pretrial filings; email B. Morris re proposed exhibit 1 to pretrial order; prepare insert for pretrial filings re punitive damages; confs. w/ opposing counsel re pretrial filings; assist with finalization of pretrial filings	MDH	14.3	14.3	\$ 5,648.50
6/9/2022	Prepare initial draft of deposition subpoena	PL	0.2	0.2	\$ 32.00
6/10/2022	Review and approve subpoenas; review status emails	BGP	0.4	0.4	\$ 198.00
6/10/2022	Email M. Gilliam re subpoena form; conf. w/ M. Gilliam re witness issues; conf. call w/ M. Gilliam and opposing counsel re witness issues; prepare email to opposing counsel re subpoenas; review subpoenas	MDH	3.2	3.2	\$ 1,264.00

6/10/2022	Prepare subpoenas for witnesses; conf. w/ M. Hill re same; email M./ Hill re same	PL2	1.5	1.5	\$ 165.00
6/11/2022	Work on joint status report objections; work on counter-designations and objections re Audrey Stone; review authority re conscience of the community and golden rule limine motions; email M. Gilliam re same; email M. Gilliam re comments, revisions, and additions to joint report on objections	MDH	4.1	4.1	\$ 1,619.50
9/3/1901	Confs. w/ M. Gilliam re pretrial filings and limine motion; email exchange re objection to initial disclosures as exhibit; review and comment on responses to motion in limine; prepare objections to jury charge and interrogatories; revise and supplement objections and responses re Local 556's witnesses and exhibits	MDH	7.8	7.8	\$ 3,081.00
6/13/2022	Revision to objections to jury interrogatories; email exchange w/ M. Gilliam re same; review and comment re charge; email P. McKeeby re additional objection; email P. McKeeby re depositions; work to finalize Joint Status Report	MDH	2.7	2.7	\$ 1,066.50
6/13/2022	Review joint status report objections; email M. Hill re same	PL2	1.0	1.0	\$ 110.00
6/14/2022	Emails and calls re subpoena issues; review pretrial documents; confs and emails re the same	BGP	4.2	4.2	\$ 2,079.00

6/14/2022	Conf. w/ B. Pryor and M. Gilliam re pretrial issues and strategy; supervise subpoena issues; email M. Gilliam re same	MDH	0.8	0.8	\$ 316.00
6/14/2022	Calculate witness fees for subpoenas; email M. Hill re same; emails re subpoenas; conf. w/ M. Hill re same; email process server subpoenas	PL2	0.6	0.6	\$ 66.00
6/15/2022	Review and revise notice re unavailability of witnesses; review rules and Judge's order the same; emails and teleconfs. w/opposing counsel re the same; email to opposing counsel re requesting witness information; review Court's order re limine issues; review pretrial documents; prepare for pretrial conf.; revise draft filing availability of witnesses; strategize re same	BGP	6.3	6.3	\$ 3,118.50
6/15/2022	Review and comment re Notice of Unavailable Witnesses; additional emails and comments re same; email process server re witnesses to serve; email M. Gilliam re authority on collateral sources	MDH	1.1	1.1	\$ 434.50
6/15/2022	Conf. w/ M. Hill re Union subpoenas; revise same; finalize same; email process server re same; review and revise notice re unavailable witnesses; conf. w/ B. Pryor re same; finalize same; file same	PL2	1.2	1.2	\$ 132.00

6/16/2022	Prepare for pretrial conference; review documents re the same; review C. Carter deposition re preparation for client meeting; attend pretrial conference; conference w/M. Gilliam and C. Carter re status and strategy	BGP	6.4	6.4	\$ 3,168.00
6/16/2022	Travel to and from courthouse	BGP	NC (1.50)	0.0	\$ -
6/16/2022	Travel to and from pretrial conference	MDH	NC (1.10)	0.0	\$ -
6/16/2022	Attend pretrial conference and viewing of voir dire room; prepare proposed email re dates of testimony	MDH	4.4	4.4	\$ 1,738.00
6/17/2022	Emails and calls re exhibit issues; emails and calls re witness and deposition issues; emails re status and strategy	BGP	1.3	1.3	\$ 643.50
6/17/2022	Review case recommended by court re business records; email B. Pryor re same; email M. Gilliam and B. Pryor re exhibit issues; call P. McKeeby and A. Greenfield re deposition dates; email B. Pryor and M. Gilliam re deposition issues; confs. w/ B. Pryor re pretrial and trial strategy issues	MDH	1.7	1.7	\$ 671.50
6/16/2022	Conf. w/B. Pryor re trial exhibits; assemble trial exhibits for trial	PL	2.4	2.4	\$ 384.00
6/17/2022	Conf. w/ B. Pryor re depositions and trial exhibits; email court reporter re same	PL2	0.1	0.1	\$ 11.00
6/18/2022	Analysis of witness issues regarding trial witnesses and those to be deposed	MDH	0.4	0.4	\$ 158.00

6/20/2022	Emails and confs. re depositions issues; review SW motion for summary judgment motion and exhibits, Carter response to the same and appendix to the same; conf. w/C. Garcia re referencing appendix numbers to trial exhibit list; emails re subpoena issues; review trial exhibits; emails re status and strategy; conf. w/D. Bruce re trial analysis and strategy	BGP	7.3	7.3	\$ 3,613.50
6/20/2022	Consult w/ B. Pryor re trial strategy	DGB	NC (1.50)	0.0	\$ -
6/20/2022	Conf. w/ B. Pryor re trial logistics and planning; email M. Gilliam re obtaining pretrial conference transcript; email P. McKeeby re depositions; conf. w/ M. Gilliam re witness importance; email M. Gilliam re deposition video logistics; prepare proposed email to opposing counsel re witness issues; email exchange w/ M. Gilliam and B. Pryor re same; email opposing counsel re same; email M. Gilliam re subpoena issues; conf. w/ M. Gilliam re same; email court reporter re videographer needed	MDH	3.2	3.2	\$ 1,264.00
6/20/2022	Prepare trial and depo subpoena chart; email M. Hill re same	PL2	0.3	0.3	\$ 33.00
6/21/2022	Numerous emails and calls re witness issues; review file and emails re the same; review trial exhibits and depositions; general trial and deposition preparation	BGP	5.5	5.5	\$ 2,722.50



6/21/2022	Email exchange w/ B. Pryor and M. Gilliam re union's extension filing; emails to court reporter re additional deposition scheduled; email B. Pryor and M. Gilliam re deadline to respond to union's motion in limine; review and comment on deposition notices; email M. Gilliam re flight attendant schedule; prepare proposed email to P. McKeeby re deposition issues; conf. w/ M. Gilliam re same; prepare proposed email to P. McKeeby re trial witness scheduling; follow-up email to M. Gilliam re deposition issues; conf. w/ P. McKeeby re deposition issues; email B. Pryor and M. Gilliam re same; email P. McKeeby re same; prepare email to E. Cloutman re witness issues	MDH	6.4	6.4	\$ 2,528.00
6/21/2022	Review deposition and trial exhibits and update chart with correlating exhibits	PL	1.1	1.1	\$ 176.00
6/21/2022	Begin Trial and Deposition Exhibit Correlation chart; email M. Hill re same; conf. w/ J. Lair re same; email M. Hill re deposition notices; prepare deposition notices; email M. Hill re same; prepare deposition subpoena; email M. Hill re same	PL2	2.8	2.8	\$ 308.00

6/22/2022	Review documents and depositions in preparation for trial and deposition of Lacore; emails w/M. Gilliam re the same; additional emails and confs. re witness issues; general trial preparation; review limine rulings; review deposition notices; emails re the same; research re evidentiary objections; conf. w/D. Bruce re strategy	BGP	9.7	9.7	\$ 4,801.50
6/22/2022	Consult w/ B. Pryor re trial strategy	DGB	0.0	0.0	\$ -
6/22/2022	Prepare for deposition of L. Rutherford; review and comment on proposed email to union re witness issues; email paralegal re subpoena form for depositions; revise deposition notices; email opposing counsel re deposition notices; email M. Gilliam re searchable trial exhibits; conf. w/ M. Gilliam re deposition logistics; email P. McKeeby re same; email court reporter re protective order; email M. Gilliam re signed copies of same; review subpoenas and witness fee calculations; email M. Gilliam re subpoena status; review court's amended order re motions in limine; email M. Gilliam re same; email court reporter re serving Talburt	MDH	8.3	8.3	\$ 3,278.50
6/22/2022	Review deposition and trial exhibits and update chart with correlating exhibits	PL	3.2	3.2	\$ 512.00

6/22/2022	Search deposition word indexes for S. Lacore; prepare deposition notices; email M. Hill re same; finalize same; continue trial and deposition exhibit chart; prepare trial subpoenas; email M. Hill re same; finalize same; email process server re subpoenas	PL2	4.5	4.5	\$ 495.00
6/23/2022	Trial preparation and preparation for Lacore deposition; review documents, emails and confs. re the same	BGP	7.4	7.4	\$ 3,663.00
6/23/2022	Consult w/ B. Pryor re trial strategy	DGB	0.0	0.0	\$ -
6/23/2022	Email M. Gilliam re Stone subpoena waiver issues; additional preparation for Rutherford deposition; email opposing counsel re exhibits for Rutherford deposition; take deposition of L. Rutherford; confs. w/ M. Gilliam re same; email court reporter re timing of transcript; email M. Gilliam re same; email exchange w/ B. Pryor re Lacore exhibits; conf. w/ B. Pryor re Lacore deposition strategy; research re conferences at deposition breaks; email B. Pryor re findings on same; review Southwest's motion to quash subpoenas	MDH	7.3	7.3	\$ 2,883.50
6/23/2022	Prepare trial subpoena for A. Stone; email M. Hill re same; revise Lacore depo prep notes; email B. Pryor re same; continue trial and deposition exhibit chart; review brief re app cites and trial exhibits	PL2	3.7	3.7	\$ 407.00

6/24/2022	Review, organize and outline deposition exhibits re Lacore; teleconf. w/M. Gilliam re the same; Lacore deposition; confs. re trial exhibits and general status and strategy; general trial prep	BGP	6.8	6.8	\$ 3,366.00
6/24/2022	Email M. Gilliam re Nevarez service status; review and comment on proposed email to P. McKeeby re Lacore availability for trial; email M. Gilliam re Stone subpoena to send for waiver of service; review Lacore trial subpoena; email M. Gilliam re same; research re court-imposed time limits; email B. Pryor and M. Gilliam re same; email B. Pryor re witness list; review depositions in preparation for trial	MDH	6.4	6.4	\$ 2,528.00
6/24/2022	Draft trial subpoena for S. Lacore; email M. Hill re same; email process server re same; continue working on trial and depo exhibit chart; email B. Pryor and M. Hill re same; email M. Monk deposition exhibits; work on trial exhibit copies	PL2	3.1	3.1	\$ 341.00

6/25/2022	General trial preparation; emails and calls w/M. Hill and M. Gilliam re status and strategy; emails w/opposing counsel re S. Lacore; emails and review of pretrial transcript re representation re S. Lacore; review and revise draft response to Local 556 motion in limine; emails and calls re the same; review response to motion to quash and emails re the same	BGP	4.2	4.2	\$ 2,079.00
6/25/2022	Email B. Pryor re Southwest's position at pretrial conference on Lacore availability; email B. Pryor re trial witness identities; revise response to Local 556's motion in limine; email M. Gilliam re same; email M. Gilliam re Nevarez affidavit of service; review and comment on response to motion to quash; identify authority re court's inherent power to compel witnesses to trial; email M. Gilliam re same	MDH	3.8	3.8	\$ 1,501.00
6/26/2022	Review case law re trial time limits; review witness list re the same; review file re the same; draft Objection to Time Limits or, in the Alternative, Motion to Extend Time Limits; review and revise the same; draft affidavit re the same; emails re the same	BGP	3.6	3.6	\$ 1,782.00

6/26/2022	Email B. Pryor re witnesses to be deposed; review and revise objection to time limits; email M. Gilliam re witness statuses; review materials in preparation for depositions of Conlon and Burdine	MDH	4.1	4.1	\$ 1,619.50
6/27/2022	General trial preparation including review limine issues and rulings, outline 4th amended complaint facts, review rial exhibits and prepare notes and witness examination re the same, outline trial objects to limine issues denied, emails re punitive damage issues, outline C. Carter trial preparation issues	BGP	7.7	7.7	\$ 3,811.50
6/27/2022	Consult w/ B. Pryor re trial strategy	DGB	NC (.20)	0.0	\$ -

6/27/2022	Email court reporter confirming depositions of Conlon and Burdine; download trial software and review operation; email B. Pryor re response to motion in limine; email B. Pryor and M. Gilliam re service status of Hudson; email M. Gilliam re exhibit question; email M. Gilliam re comments on response to motion to quash; confs. w/ M. Gilliam re deposition questions and trial strategy; email paralegal re information for Talburt service; email M. Gilliam re Stone subpoena issues; email process server emphasizing importance of timing in Talburt service; confs. w/ B. Pryor and M. Gilliam re trial strategy and witness assignments; follow-up emails re same; prepare for depositions of Conlon and Burdine	MDH	8.7	8.7	\$ 3,436.50
6/27/2022	Update subpoena chart re status of service; email M. Hill re same; call process server re same; email process server re same	PL2	0.9	0.9	\$ 99.00

6/28/2022	Emails re probable and possible trial witnesses, assigning witnesses; status of subpoenas, Hudson deposition and order of witnesses; teleconf. w/M. Gilliam and M. Hill re the same; review trial exhibits re content and determination of use at trial with witnesses; emails re the same; emails re redacted information in certain exhibits; emails re additional trial exhibits; emails re Stone subpoena and witness fees; teleconf. re motion to enlarge time; conf. w/D. Bruce re trial strategy; emails re C. Carter preparation; review documents re Carter preparation; emails re trial objections to evidence and limine issues	BGP	8.6	8.6	\$ 4,257.00
6/28/2022	Consult w/ B. Pryor re trial strategy	DGB	NC (.70)	0.0	\$ -



6/28/2022	Finish preparing for Conlon deposition; email exhibits to opposing counsel and court reporter; depose B. Conlon; confs. w/ M. Gilliam re same; email paralegal re Lacore subpoena; conf. w/ M. Gilliam re Cleburn deposition; email court reporter re exhibits and timing; conf. w/ B. Pryor and M. Gilliam re witness strategy; email B. Pryor and M. Gilliam re Stone waiver of service requirements; review and comment on proposed email re Hudson deposition cancellation and trial attendance; email M. Gilliam re language for email to opposing counsel re Conlon's deposition testimony being used at trial; update response to motion to quash with service statuses; email M. Gilliam re same; email court reporter re cancellation of Hudson deposition; email M. Gilliam proposed language re confirmation on Stone attendance; prepare for deposition of N. Cleburn; review and comment on proposed email to opposing counsel on witness issues	MDH	10.4	10.4	\$ 4,108.00
6/28/2022	Assemble additional copy of trial exhibits	PL	1.4	1.4	\$ 224.00
6/28/2022	Update subpoena chart re status of service; email M. Hill re same	PL2	0.6	0.6	\$ 66.00

6/29/2022	Digest C. Carter deposition; review exhibits re the same; general trial preparation; review supplemental exhibits and emails re the same; emails w/opposing counsel re witness issues; review order from Court re the same; review and revise status report; emails re the same; review and revise motion to enlarge time; emails re the same; review affidavit re the same	BGP	9.3	9.3	\$ 4,603.50
6/29/2022	Email paralegal re additional exhibits; email M. Gilliam re deposition invoices; final preparation for Cleburn deposition; depose N. Cleburn; email court reporter re exhibits and delivery; conf. w/ M. Gilliam re deposition; conf. w/ B. Pryor re deposition highlights; review and comment on objection to time limits and affidavit re same; prepare chart for joint status report; email M. Gilliam and B. Pryor re same; email P. McKeeby re same; conf. w/ K. Frye re scheduling courtroom technology test; work on joint status report ordered by court on witness issues; email B. Pryor and M. Gilliam re same; email paralegal re same; email P. McKeeby re same; confs. and emails w/ opposing counsel re finalizing joint status report; finalize same for filing; prepare deposition designations for L. Rutherford	MDH	10.6	10.6	\$ 4,187.00

6/29/2022	Work on additional trial exhibits; update subpoena chart; email M. Hill re same; prepare appendix re joint status report; email M. Hill re same; review and revise joint status report; conf. w/ M. Hill re same; assemble exhibits re appendix; finalize same; file same	PL2	4.2	4.2	\$ 462.00
6/30/2022	Emails re deposition designations; prepare for C. Carter trial preparation; conf. w/C. Carter and M. Gilliam re the same; review and digest A. Stone deposition; review exhibits re the same; review and revise motion to enlarge and affidavit re the same; confs. re the same; emails re additional trial exhibits; confs. re the same; review court order re witnesses; confs. and emails re the same; confs. w/M. Hill and M. Gilliam re status and strategy; confs. re determining trial witnesses, order of the same and time allocations	BGP	9.6	9.6	\$ 4,752.00

6/30/2022	Review and comment on deposition designation filings; email paralegal re Rutherford designations; email M. Gilliam re same; email video sync firm re protective order acknowledgement; additional revisions to motion to extend time limits; confs. w/ M. Gilliam and B. Pryor re same; confs. w/ M. Gilliam and B. Pryor re trial strategy and witnesses; conf. w/ C. Carter re trial; prepare designations for Conlon and Cleburn depositions; email M. Gilliam re same; email opposing counsel re motion regarding time limits; email opposing counsel re protective order issues; email opposing counsel re exhibit issue; additional revisions to motion re time limits and affidavit; email opposing counsel in response to order on witnesses; email video sync company re file format for transcripts; additional conf. w/ M. Gilliam and B. Pryor re witness strategy and timing; email videographer re status of deposition videos; review errata sheets from Rutherford and Lacore; email M. Gilliam re same; review and comment on motion for leave to submit exhibits; email exchange w/ M. Gilliam re same; review and comment on deposition designations	MDH	9.4	9.4	\$ 3,713.00
6/30/2022	Prepare supplemental deposition designations; review designations for Cleburn and Conlon	PL	0.6	0.6	\$ 96.00

6/30/2022	Review designations to add L. Rutherford depo designations; email M. Hill re same; add B. Conlon designations; email J. Lair re same; update subpoena chart; email M. Hill re same	PL2	1.0	1.0	\$ 110.00
7/1/2022	Review pleading re after-acquired evidence defense; emails re the same; prepare for C. Carter trial preparation session; conf. w/M. Gilliam and C. Carter re the same; review Burdine related documents; emails and confs. re press inquiries; review court second amended order on motions in limine; confs. and emails re the same; consider and outline evidence re the same; emails re communication w/Court re efforts to obtain Talburt deposition; review email from opposing counsel re Parker, Nevarez and Talburt subpoena issues; emails re the same; review draft status report re the same; emails w/opposing counsel re depositions; review latest court order re witness subpoenas and depositions; emails and confs. re the same; review Court order re late added exhibits; review deposition designations; review exhibits and prepare for examination of witnesses at trial	BGP	9.0	9.0	\$ 4,455.00

7/1/2022	Review pleadings re after-acquired evidence; email M. Gilliam and B. Pryor re same; email process server re service of Talburt; meet w/ K. Frye at courthouse to test video setup for trial; email exchange w/ R. Jones re synching deposition videos; review and comment on proposed email to opposing counsel re Parker, Talburt, and Nevarez depositions; review and revise status report on witnesses; review and approve deposition subpoenas of Talburt and Nevarez; set up synched transcripts in presentation software; set up exhibits re same; prepare draft email to P. McKeeby re witness status; prepare email to process server re Talburt; revise deposition notices to Talburt and Nevarez; prepare additional draft email to P. McKeeby re deposition issues; email process server re Nevarez; email court reporter/videographer re noticed depositions; conf. w/ process server re Nevarez; prepare draft designations for Burdine	MDH	8.6	8.6	\$ 3,397.00
7/1/2022	Travel to and from courthouse	MDH	NC (1.00)	0.0	\$ -

7/1/2022	Email process server re status; call process server re same; conf. w/ M. Gilliam re same; update subpoena chart; prepare draft deposition subpoenas for Talburt and Nevarez; email M. Hill re same; prepare deposition notices for Talburt and Nevarez; email M. Hill re same; call process servers re pricing and availability; conf. w/ M. Hill re same; email process server re Brian Talburt; email M. Hill re process server for Brett Nevarez; prepare juror chart; email to M. Hill re same; revise deposition notices for Talburt and Nevarez; review pleadings on docket	PL2	2.7	2.7	\$ 297.00
7/2/2022	Prepare witness notebooks for S. Lacore, B. Talburt and N. Hudson; review C. Carter deposition; emails re witness depositions; emails and confs. re B. Talburt deposition; review documents re Talburt deposition; Talburt deposition preparation; review exhibits and prepare for examination of witnesses at trial; emails re time limits on Talburt deposition	BGP	8.4	8.4	\$ 4,158.00

7/2/2022	Prepare for examination of B. Nevarez; emails to P. McKeeby re depositions of Talburt and Nevarez; prepare presentation software for presentation of exhibits and videos; review and comment on juror diagram; revise juror chart; select portions of Conlon deposition to designate; email Burdine questioning clip to B. Pryor for use with Schneider; review documents sent by C. Carter; conf. w/ P. McKeeby re Talburt deposition; follow-up email re same; conferences w/ M. Gilliam and B. Pryor re trial preparation; email court reporters re deposition scheduling; work on witness order and strategy; prepare new subpoena for B. Talburt; confs. w/ process server re serving Talburt; prepare draft email to E. Cloutman re deposition of Talburt; follow-up email to court reporters with update; email exchange w/ P. McKeeby re deposition scheduling	MDH	9.4	9.4	\$ 3,713.00
7/2/2022	Update B. Pryor's exhibit notebooks with added exhibits; update exhibit folders and C. Carter's exhibit binders with added exhibits; trial preparation	PL2	5.1	5.1	\$ 561.00



7/3/2022	Finalize preparation for Talburt deposition; prepare for Stone trial examination; review trial exhibits and highlight questions and related witnesses; review M. Gilliam notes re Talburt deposition; Talburt deposition' trial preparation	BGP	12.2	12.2	\$ 6,039.00
7/3/2022	Email P. McKeeby re Talburt deposition scheduling; email court reporters updating re same; continue preparing for deposition of B. Nevarez; identify exhibits for same; analysis of potential additional exhibits; email P. McKeeby re deposition; prepare exhibits for trial; confs. w/ B. Pryor and M. Gilliam re trial strategy; email opposing counsel re Talburt exhibits	MDH	9.2	9.2	\$ 3,634.00
7/3/2022	Trial preparation including updating update trial exhibits; review pretrial transcript and prepare notes re procedures to follow during trial	PL	5.0	5.0	\$ 800.00
7/4/2022	Prepare opening and voir dire; continue review of trial exhibits and highlight questions and related witnesses; conf. w/M. Hill, M. Gilliam, and C. Carter re opening	BGP	11.8	11.8	\$ 5,841.00

7/4/2022	Additional preparation for Nevarez deposition; finalize jury charts; email M. Gilliam re same; attend non-appearance by B. Nevarez at deposition; comment on proposed opening from B. Pryor; strategy re witness order and trial presentation; prepare for examination of J. Parrott; prepare for examination of M. Sims; email M. Gilliam re potential justifications for sanctions on defendants re depositions; prepare for trial	MDH	10.8	10.8	\$ 4,266.00
7/4/2022	Trial preparation including updating update trial exhibits; review pretrial transcript and prepare notes re procedures to follow during trial	PL	4.5	4.5	\$ 720.00
7/5/2022	Additional preparation for opening and voir dire; prepare final anticipated witness list, order of witnesses and time allotments; review emails and court rulings re voir dire questions; conf, at trial w/court re voir dire issues and general trial matters; voir dire; hearing before court on strikes for cause; confs. re exercising peremptory challenges; hearing before court on trial matters; conf w/M. Hill and M. Gilliam re status and strategy	BGP	9.3	9.3	\$ 4,603.50
7/5/2022	Travel to and from Court	BGP	NC (1.00)	0.0	\$ -
7/5/2022	Teleconf. w/B. Pryor re strategy re jury selection and opening	DGB	NC (.60)	0.0	\$ -

7/5/2022	Review and comment re motion for compliance with court order; conf. w/ M. Gilliam re same; email exchange w/ M. Gilliam re daily transcripts; review and comment on proposed order on failure to appear; email OnCue re issues displaying exhibits; email B. Pryor re objections to make at trial; notes re preparation for voir dire; attend voir dire; prepare proposed exhibit email for court; prepare unredacted exhibits; prepare designations for J. Parker; preparations for potential witness examinations	MDH	10.6	10.6	\$ 4,187.00
7/5/2022	Travel to and from Court	MDH	NC (.80)	0.0	\$ -
7/5/2022	Email M. Hill indexes of trial boxes	PL2	0.1	0.1	\$ 11.00
7/6/2022	Prepare for opening and Stone examination; conf. w/court re trial matters; trial including opening and Stone examination; post trial confs w/court; conf w/M. Hill and M. Gilliam re status and strategy	BGP	10.6	10.6	\$ 5,247.00
7/6/2022	Travel to and from Court	BGP	NC (1.00)	0.0	\$ -
7/6/2022	Teleconf. w/OPC's paralegal re exhibit list; email w/M. Hill re same; conf. w/C. Garcia re same; teleconf. w/B. Pryor re strategy re witness examination	DGB	NC (.50)	0.0	\$ -

7/6/2022	Attend trial; email S. Rhea re exhibit list; email OnCue re support for presentation software; email M. Gilliam re designation objections; prepare responses to objections re Parrott and Rutherford designations	MDH	11.4	11.4	\$ 4,503.00
7/6/2022	Travel to and from Court	MDH	NC (.80)	0.0	\$ -
7/6/2022	Call w/ S. Rhea re exhibit list; revise joint exhibit list; email M. Hill re same; file amended exhibit list; email M. Hill re same; review video duration times; email M. Hill re same; update subpoena chart	PL2	0.6	0.6	\$ 66.00
7/7/2022	Prepare for additional Stone examination and prepare for Schneider examination; prepare argument for additional jury time; conf w/court re trial matters including request for additional jury time; trial including examination of Stone and Schneider; post trial confs. w/court; conf w/M. Hill and M. Gilliam re status and strategy; preparation for additional Schneider examination and Carter examination	BGP	13.4	13.4	\$ 6,633.00
7/7/2022	Travel to and from Court	BGP	NC (1.00)	0.0	\$ -
7/7/2022	Teleconf. w/B. Pryor re upcoming Carter examination	DGB	NC (.60)	0.0	\$ -

7/7/2022	Revisions to responses to objections to Parrott and Rutherford designations; email S. Silver re Exhibit 21; attend trial; email paralegals re redactions; revise Talburt designations to cut time; edit video re same; email paralegals re serving Nevarez; email opposing counsel re service of Nevarez; conf. w/ process server re same; email process server re revisions to declaration; prepare proposed declaration re same; email K. Willis re Talburt designations; email M. Gilliam re status of same	MDH	11.3	11.3	\$ 4,463.50
7/7/2022	Travel to and from Court	MDH	NC (.80)	0.0	\$ -
7/7/2022	Redactions to trial exhibits and marking as trial exhibits	PL	0.8	0.8	\$ 128.00
7/7/2022	Prepare revised draft deposition subpoena for Brett Nevarez; call New Mexico process server; email M. Hill re same; call Dona Ana Process Servers re service on Brett Nevarez; email M. Hill re same; email Dona Ana process server and M. Hill re Brett Nevarez service; review exhibit list to check if Exhibit 21-a was added twice; email M. Hill re same	PL2	1.5	1.5	\$ 165.00
7/8/2022	Trial preparation; conf. w/court re trial matters; trial including examination of Schneider and Carter; conf. w/court re post trial matters; conf w/M. Hill and M. Gilliam re status and strategy	BGP	9.8	9.8	\$ 4,851.00

7/8/2022	Travel to and from Court	BGP	NC (1.00)	0.0	\$ -
7/8/2022	Email exchange w/ M. Gilliam re process server declaration; prepare Zoom link for Nevarez deposition; email court reporters and opposing counsel re same; attend trial; prepare for Nevarez deposition; take Nevarez deposition; confs. w/ B. Pryor and M. Gilliam re same; email videographer re same; email B. Pryor and M. Gilliam re excusing Parrott and Shaffer; email M. Gilliam re notifying court on Nevarez deposition; email court re same	MDH	11.6	11.6	\$ 4,582.00
7/8/2022	Travel to and from Court	MDH	NC (.80)	0.0	\$ -
7/9/2022	Status email re invoking the rule issues, objecting to cyber bullying exhibit, future use of time, February 2017 RFB exhibit, Nevarez deposition, C. Carter testimony, potential Sim testimony, and directed verdict issues; emails re the same; review documents and emails re designation of workplace bullying policy; review court draft jury questions; review Local 556 brief re directed verdict issues; review SW brief re directed verdict issues; review C. Carter brief re directed verdict; review Nevarez designations	BGP	4.5	4.5	\$ 2,227.50

7/9/2022	Email answers to trial strategy questions from B. Pryor; review and comment on draft trial brief; conf. w/ M. Gilliam re same; email potential authority for use in same to M. Gilliam; email R. Jones re synching Nevarez transcript; review and revise trial brief; email M. Gilliam re same; prepare designations for B. Nevarez; prepare video re same	MDH	5.6	5.6	\$ 2,212.00
7/10/2022	Review notes re C. Carter direct examination and prepare for conclusion of the same; review documents re C. Carter damages; prepare examination re the same; prepare for opposition to late added exhibit re cyber bullying; review documents re the same; emails re damage issues; review directed verdict notes; organize Carter deposition re doctrine of optional completion on anticipated cross examination topics	BGP	5.6	5.6	\$ 2,772.00
7/10/2022	Teleconf. w/B. Pryor re trial strategy and case theories	DGB	NC (.30)	0.0	\$ -
7/10/2022	Email M. Gilliam re Nevarez designations; email B. Pryor re C. Carter direct strategy; review and comment on jury charge trial brief; identify exhibits to object to; review and comment on draft objections; email S. Silver re Exhibit 147	MDH	4.2	4.2	\$ 1,659.00

7/11/2022	Additional preparation for C. Carter cross examination; prepare for informal charge conference; review draft instructions and questions re the same; informal charge conference; pretrial matters; trial including conclusion of C. Carter examination, resting C. Carter case, SW witnesses and post-trial issues; prepare for cross examination of Schneider and initial preparation for closing	BGP	12.6	12.6	\$ 6,237.00
7/11/2022	Travel to and from Court	BGP	NC (1.00)	0.0	\$ -
7/11/2022	Identify objections to deposition counter-designations by Southwest; prepare draft objections; email M. Gilliam re same; attend trial; email opposing counsel re redacted exhibits; email B. Pryor re Schneider transcripts; review and comment on potential objections; email K. Frye re redacted exhibits; email B. Pryor and M. Gilliam re accommodation language; prepare exhibit re net worth; email B. Pryor re strategy re same	MDH	11.2	11.2	\$ 4,424.00
7/11/2022	Travel to and from Court	MDH	NC (.80)	0.0	\$ -
7/11/2022	Additional redactions for Court; email exchange w/ M. Hill; determine exhibit correlation; revise exhibits; email M. Hill re same	PL2	1.6	1.6	\$ 176.00



7/12/2022	Emails and confs re damage issues; review daily trial transcripts re witness examination and closing preparation; review court draft jury charge; trial including cross examination of SW witnesses and C. Carter; review trial exhibits re preparation for demonstrative evidence during closing; conf w/M. Gilliam and M. Hill; charge conference; prepare for closing argument; teleconfs re the same	BGP	14.6	14.6	\$ 7,227.00
7/12/2022	Travel to and from Court	BGP	NC (1.00)	0.0	\$ -
7/12/2022	Attend trial; analysis of court's jury charge; conf. w/ B. Pryor re closing; prepare materials re same; email B. Pryor re strategy for union punitive damage argument; work on preparing exhibits and testimony for closing; email B. Pryor re outline re same	MDH	16.8	16.8	\$ 6,636.00
7/12/2022	Travel to and from Court	MDH	NC (.80)	0.0	\$ -
7/12/2022	Assemble admitted trial exhibits for jury; update index re same	PL	2.1	2.1	\$ 336.00
7/12/2022	Assemble admitted exhibits notebooks	PL2	1.2	1.2	\$ 132.00
7/13/2022	Prepare for closing; emails and confs. re the same; pretrial conf. issues; trial including closing	BGP	10.3	10.3	\$ 5,098.50
7/13/2022	Travel to and from Court	BGP	NC (1.00)	0.0	\$ -
7/13/2022	Work on identifying additional testimony for closing; prepare highlights re same; prepare exhibits re same; attend trial; strategy re jury question	MDH	6.1	6.1	\$ 2,409.50

7/13/2022	Travel to and from court; wait for jury verdict	MDH	NC (3.80)	0.0	\$ -
7/13/2022	Update admitted trial exhibits index with additional admitted exhibits; email re same	PL	0.3	0.3	\$ 48.00
7/13/2022	Revise admitted trial exhibits index; email M. Hill re same; conf. w/ M. Hill re admitted trial exhibits index; revise same; email M. Hill re same; call w/ courier re box of admitted trial exhibits to court	PL2	0.8	0.8	\$ 88.00
7/14/2022	Travel to courthouse; await jury verdict; hearing re jury verdict; conf. w/client	BGP	NC (4.80)	0.0	\$ -
7/14/2022	Strategy re jury questions; analysis of verdict; wrap up trial and remove documents from courtroom	MDH	1.6	1.6	\$ 632.00
7/14/2022	Wait for jury verdict; travel to and from Court	MDH	NC (7.30)	0.0	\$ -
7/15/2022	Emails re press inquiries; emails re status and strategy; review press reporting re Southwest and Union statements; emails and teleconf w/M. Gilliam re contact w/jurors	BGP	0.4	0.4	\$ 198.00
7/15/2022	Email M. Gilliam and B. Pryor re media strategy; email M. Gilliam re Rule 50 timing	MDH	0.2	0.2	\$ 79.00
7/16/2022	Analysis re post-verdict motions; email findings to M. Gilliam	MDH	1.7	1.7	\$ 671.50
7/18/2022	Review press reports; calls and confs re the same; interview juror; confs w/M. Gilliam re status and strategy	BGP	NC (3.30)	0.0	\$ -

7/18/2022	Search and email M. Hill re sample of motion for fees	PL2	0.6	0.6	\$ 66.00
7/19/2022	Prepare prejudgment interest calculation; locate cases re calculation of same; email M. Gilliam re same	MDH	0.6	0.6	\$ 237.00
7/20/2022	Email M. Gilliam re confidentiality of trial transcripts	MDH	0.1	0.1	\$ 39.50
7/24/2022	Begin review of motion for judgment; email M. Gilliam re same	MDH	1.1	1.1	\$ 434.50
7/25/2022	Review cases re damage caps on union; email exchange w/ M. Gilliam re same; review and comment on motion for judgment; review and comment on affidavit in support of same; revise prejudgment interest calculation spreadsheet; emails to B. Pryor and M. Gilliam re same	MDH	2.3	2.3	\$ 908.50
7/26/2022	Review revised motion for judgment; confs. w/ M. Gilliam re same; emails w/ M. Gilliam re same;	MDH	1.3	1.3	\$ 513.50
7/27/2022	Review court's order to determine deadline for potential reply re sanctions; email M. Gilliam re same	MDH	0.1	0.1	\$ 39.50
8/2/2022	Conf. w/ M. Gilliam re judgment issues; email M. Gilliam re article and case re same; locate and email M. Gilliam unredacted documents	MDH	0.6	0.6	\$ 237.00
8/3/2022	Conf. w/ M. Gilliam re invoices; email M. Gilliam re same	MDH	NC (.30)	0.0	\$ -
8/3/2022	Conf. w/ M. Gilliam re RLA punitive damages issue	MDH	0.6	0.6	\$ 237.00

8/5/2022	Review Local 556 correspondence to SWA re Lacore; emails and calls re the same	BGP	NC (.40)	0.0	\$ -
8/8/2022	Review and comment on reply in support of motion for sanctions; email M. Gilliam re same	MDH	0.8	0.8	\$ 316.00
8/9/2022	Review Hill declaration re sanction; review reply re non-compliance; emails re the same	BGP	NC (.40)	0.0	\$ -
8/9/2022	Conf. w/ M. Gilliam re reply in support of motion for sanctions; additional comments on same; review and comment on Hill Declaration re same; review Southwest's response to motion for entry of judgment; review union's response re same	MDH	0.8	0.8	\$ 316.00
8/10/2022	Review SW response to Motion for Entry of Judgment; review B. Morris affidavit; emails re the same; emails re press inquiries	BGP	NC (.40)	0.0	\$ -
8/11/2022	Conf. w/ M. Gilliam re issues in reply in support of motion for judgment	MDH	0.3	0.3	\$ 118.50
8/12/2022	Email re comments to SW motion re entry of judgment	BGP	NC (.20)	0.0	\$ -
8/15/2022	Review reply to SW response to motion for entry of judgment; email comments to M. Hill re the same	BGP	NC (.40)	0.0	\$ -
8/15/2022	Review draft reply in support of motion for judgment re Southwest; email M. Gilliam re same	MDH	0.3	0.3	\$ 118.50

8/16/2022	Review and comment on Local 556 response to motion for judgment; emails re the same	BGP	NC (.50)	0.0	\$ -
8/16/2022	Comment on draft reply in support of motion for judgment re Southwest; comment on same re union; additions to draft reply in support of judgment to address Scudero case; conferences w/ M. Gilliam re briefs	MDH	4.8	4.8	\$ 1,896.00
8/31/2022	Email M. Gilliam re attorney fee affidavit sample	MDH	0.2	0.2	\$ 79.00
11/11/2022	Review court order re calculation of prejudgment interests; emails re the same	BGP	0.2	0.2	\$ 99.00
11/11/2022	Review order re prejudgment interest; email M. Gilliam re interest calculation logistics; conf. w/ M. Gilliam re same; prepare spreadsheet re same	MDH	0.9	0.9	\$ 355.50
11/13/2022	Initial review of brief and chart re prejudgment interest	MDH	0.2	0.2	\$ 79.00
11/14/2022	Review supplemental brief re calculation of prejudgment interest; emails re the same	BGP	0.2	0.2	\$ 99.00
11/14/2022	Review and comment on prejudgment interest brief and calculation; email M. Gilliam re same; conf. w/ M. Gilliam re same; final review and comments on brief	MDH	2.3	2.3	\$ 908.50
11/16/2022	Review Union brief re pre-judgment interest; emails re the same; review Court's order re award of sanctions; prepare emails to M. Hill re matters for inclusion	BGP	0.7	0.7	\$ 346.50

11/16/2022	Email M. Gilliam re advisability of motion to strike late-filed brief; review Court's order re award of sanctions	MDH	0.3	0.3	\$ 118.50
11/17/2022	Review and comment on draft submission on Nevarez; emails to M. Hill re same	BGP	0.3	0.3	\$ 148.50
11/17/2022	Review and revise draft submission on Nevarez fees from M. Gilliam; review invoices to identify time to include; research to locate additional cases for inclusion in submission; review and comment on proposed addition from B. Pryor; confs. w/ M. Gilliam re submission	MDH	5.1	5.1	\$ 2,014.50
11/18/2022	Email M. Hill re additional thoughts on Nevarez fee submission; review and approve declaration of B. Pryor re fees and expenses; additional review and comment re fee submission; confs. w/ M. Hill re same	BGP	0.6	0.6	\$ 297.00
11/18/2022	Further revisions to submission re Nevarez; confs. w/ M. Gilliam re same	MDH	4.6	4.6	\$ 1,817.00
11/18/2022	Review August invoice for expenses related to Nevarez; email M. Hill re same; conf. w/ M. Hill re same; review expense chart re additional Nevarez charges; email M. Hill re same	PL2	0.3	0.3	\$ 33.00
11/21/2022	Email B. Pryor re bill of costs filing correction by court	MDH	0.1	0.1	\$ 39.50
11/22/2022	Review Southwest and Union objections to bill of costs; emails re the same	BGP	0.3	0.3	\$ 148.50

11/22/2022	Review Southwest's objection re sanctions; email M. Gilliam key argument points re same	MDH	0.3	0.3	\$ 118.50
11/25/2022	Review reply brief re bill of costs	BGP	0.1	0.1	\$ 49.50
11/25/2022	Review, revise, and comment on reply brief re sanctions; email M. Gilliam re same; confs. w/ M. Gilliam re same; email M. Gilliam re local rule issue; final review and comments on reply brief	MDH	2.7	2.7	\$ 1,066.50
12/5/22	Review order re sanctions; emails re the same; review order and opinion re judgment; emails re the same	BGP	0.1	0.1	\$ 49.50
12/5/22	Review and analysis of court's order on sanctions, opinion on judgment, and judgment	MDH	0.7	0.7	\$ 276.50
12/12/22	Emails and teleconfs. re issues relating to sanctions order and issues re SW potential appeal and bond	BGP	0.3	0.3	\$ 148.50
12/12/22	Conference w/ paralegal re expenses for inclusion in bill of costs; email M. Gilliam re same; email M. Gilliam information for attorney fee motion	MDH	0.4	0.4	\$ 158.00
12/14/22	Emails and teleconfs. re fee application issues and bond issues	BGP	0.3	0.3	\$ 148.50
12/14/22	Email M. Gilliam comments re supersedeas bond response to P. McKeeby; review rules and cases re same; email M. Gilliam re same	MDH	0.8	0.8	\$ 316.00
12/15/22	Review and revision of attorney fee motion	MDH	3.7	3.7	\$ 1,461.50

12/15/22	Review expense chart; review invoices and payments of same	PL2	2.3	2.3	\$ 253.00
12/16/22	Review invoice and allocate time; email to M. Gilliam and M. Hill re issues relating to the same	BGP	1.2	1.2	\$ 594.00
12/16/22	Additional revision of attorney fee motion; confs. w/ B. Pryor and M. Gilliam re same; email revised motion to M. Gilliam; email M. Gilliam re authority for inclusion in fee petition; email and conf. w/ paralegal re updating bill of costs; review and comment on motion and order re attorney fees	MDH	5.2	5.2	\$ 2,054.00
12/16/22	Continue reviewing expense chart; continue reviewing invoices and payments of same; email M. Hill re same; conf. w/ M. Hill re bill of costs; review bill of costs and expense chart	PL2	2.4	2.4	\$ 264.00
12/17/22	Analysis of invoices for inclusion in attorney fee petition; confs. w/ M. Gilliam re same and arguments in attorney fee petition; emails w/ M. Gilliam re issues for attorney fee petition	MDH	3.5	3.5	\$ 1,382.50
12/18/22	Review and comment on proposed declarations of M. Gilliam, J. Winford, and B. Pryor re attorney fees; emails and confs. w/ M. Gilliam re strategic issues in attorney fee petition; email B. Pryor re same	MDH	3.2	3.2	\$ 1,264.00
12/18/22	Continue to review and revise bill of costs	PL2	1.6	1.6	\$ 176.00



12/19/22	Continue to review and revise bill of costs; email M. Hill re same	PL2	3.5	3.5	\$ 385.00
12/19/22	Confs. w/ M. Gilliam, B. Pryor, and C. Garcia re motion for attorneys' fees and bill of costs; revisions to same; research re items included in bill of costs and expenses	MDH	6.1	6.1	\$ 2,409.50
12/19/22	Review and revise motions re fees and costs; emails and confs. re the same; review exhibits to the same; review declaration and exhibits re the same	BGP	3.2	3.2	\$ 1,584.00
Total				715.3	\$ 292,094.00

**EXHIBIT 3 – EXPENSES BILLED BY PRYOR & BRUCE**

<b>Description</b>	<b>Amount</b>
Pryor & Bruce PACER printouts necessarily obtained for use in the case	\$19.60
Fee to serve trial subpoena on witness Jessica Parker	\$175.00
Witness fees for Jessica Parker	\$1,019.40
Fee to serve trial subpoena on witness Jessica Parker	\$3.00
Fee to serve trial subpoena on witness Jessica Parker	\$4.00
Fees to serve trial subpoena on Brett Nevarez	\$175.00
Witness fees for Brett Nevarez	\$840.04
Fees to serve trial subpoena on Brett Nevarez	\$3.00
Fees to serve trial subpoena on Brett Nevarez	\$4.00
Fee to serve trial subpoena on Brian Talburt	\$175.00
Fee to serve trial subpoena on Brian Talburt	\$3.00
Fee to serve trial subpoena on Brian Talburt	\$4.00
Fees to serve trial subpoenas on Jessica Parker, Brett Nevarez and Brian Talburt	\$92.26
Fee to serve trial subpoena on Edith Barnett	\$50.00
Witness fees for Edith Barnett	\$40.83
Fee to serve trial subpoena on Nancy Cleburne	\$50.00
Witness fees for Nancy Cleburne	\$40.83
Fee to serve trial subpoena on Brendon Conlon	\$50.00
Witness fees for Brendon Conlon	\$40.83
Fee to serve trial subpoena on Maureen Emlett	\$50.00
Witness fees for Maureen Emlett	\$40.83
Fee to serve trial subpoena on Denise Gutierrez	\$50.00
Witness fees for Denise Gutierrez	\$40.83
Fee to serve trial subpoena on Naomi Hudson	\$50.00
Witness fees for Naomi Hudson	\$40.83
Fee to serve trial subpoena on Megan Jones	\$50.00
Witness fees for Megan Jones	\$40.83
Fee to serve trial subpoena on Sonya Lacore	\$50.00
Witness fees for Sonya Lacore	\$40.83
Fee to serve trial subpoena on Brett Nevarez	\$50.00
Witness fees for Brett Nevarez	\$40.83
Fee to serve trial subpoena on Jessica Parker	\$50.00
Witness fees for Jessica Parker	\$40.83
Fee to serve trial subpoena on John Parrott	\$50.00
Witness fees for John Parrott	\$40.83
Fee to serve trial subpoena on Ed Schneider	\$50.00
Witness fees for Ed Schneider	\$40.83
Fee to serve trial subpoena on Tammy Shaffer	\$50.00
Witness fees for Tammy Shaffer	\$40.83
Fee to serve trial subpoena on Brian Talburt	\$50.00
Witness fees for Brian Talburt	\$40.83

Fee to serve trial subpoena on Mike Sims	\$105.00
Witness fees for Mike Sims	\$40.83
Fee to serve trial subpoena on Mike Sims	\$35.00
Fee to serve trial subpoena on Denise Gutierrez	\$105.00
Witness fees for Denise Gutierrez	\$61.24
Fee to serve trial subpoena on Naomi Hudson	\$105.00
Witness fees for Naomi Hudson	\$40.00
Fee to serve trial subpoena on Naomi Hudson	\$45.00
Fee to serve deposition subpoena on Naomi Hudson	\$50.00
Witness fee for Naomi Hudson	\$64.54
Fee to serve trial subpoena on Brett Nevarez	\$50.00
Witness fee for Brett Nevarez	\$42.54
Fee to serve trial subpoena on Jessica Parker	\$50.00
Witness fee for Jessica Parker	\$42.54
Witness fee for Brett Nevarez	\$41.06
Fee to serve trial subpoena on Jessica Parker	\$105.00
Fee to serve trial subpoena on Jessica Parker	\$41.06
Fee to serve trial subpoena on Tammy Shaffer	\$105.00
Witness fee for Tammy Shaffer	\$89.44
Pryor & Bruce Pacer printouts necessarily obtained for use in the case	\$1.70
OnCue Technology Support - Trial Presentation Software Rental	\$86.40
Fee to serve trial subpoena on Melissa Burdine	\$105.00
Fee to serve trial subpoena on Edith Barnett	\$105.00
Witness fee for Edith Barnett	\$59.94
Fee to serve trial subpoena on Sonya Lacore	\$105.00
Fee to serve trial subpoena on Sonya Lacore	\$45.00
Witness fees for Sonya Lacore	\$61.36
Fee to serve trial subpoena on John Parrott	\$105.00
Witness fees for John Parrott	\$47.20
Fees to serve show cause order on Brett Nevarez	\$95.00
Fees to serve show cause order on Brett Nevarez	\$40.00
Fees to serve show cause order on Brett Nevarez	\$11.22
Fee to serve deposition subpoena on Brian Talburt	\$1,240.00
Metro One Courier to Court for materials – admitted trial exhibits – necessarily obtained for use in the case	\$104.83
Staples color copies of Exhibit 90-E materials necessarily obtained for use in the case	\$22.03
Mileage for attorneys traveling to and from court (317 x .29)	\$91.93
<b>Total</b>	<b>\$7,333.78</b>